DOCUMENT RESUME

ED 266 574 EC 181 738

AUTHOR	Skrtic, Thomas M.; And Others
TITLE	Interorganizational Special Education Programming in Rural Areas: Technical Report on the Multisite Naturalistic Field Study. Volumes I through IV.
INSTITUTION	Kansas Univ., Lawrence. Dept. of Special Education.
SPONS AGENCY	National Inst. of Education (ED), Washington, DC.
PUB DATE	85
CONTRACT	400-81-0017
NOTE	887p.
PUB TYPE	Reports - Research/Technical (143)
EDRS PRICE	MF06/PC36 Plus Postage.
DESCRIPTORS	Boards of Education; Case Studies; *Compliance (Legal); *Cooperative Programs; Delivery Systems; *Disabilities; Elementary Secondary Education; Federal Aid; *Federal Legislation; Needs Assessment; Program Administration; Program Effectiveness; *Rural Education; *School District Autonomy
IDENTIFIERS	*Education for All Handicapped Children Act

ABSTRACT

The report discusses a field study of the implementation of major requirements of P.L. 94-142, the Education For All Handicapped Children Act, by rural districts, and presents detailed case studies of five districts' responses. The first volume introduces the naturalistic model of inquiry, noting its philosophical underpinnings and basic characteristics. Operational Procedures in carrying out the field study research are addressed, including design update, site selection, data analysis, draft reviews, and steps to assume trustworthiness of the data (including its credibility, transferability, and dependability). Results of the field study are examined in terms of organizational/governance issues, service and delivery mechanism issues, effectiveness and impact issues. Among conclusions and policy recommendations offered is the need to clarify and simplify P.L. 94-142; provide more resources, proportionately, to rural areas; fully fund mandated programs; and stimulate formulas. A series of trade-offs in the policy decision process are also considered. Volumes II and III of the report present the detailed case studies of five rural districts and their responses to implementing P.L. 94-142. Volume IV contains four commissioned papers with the following titles and authors: "Special Education in Rural America" (P. Worth); "Dean's Grants Projects and Rural Education" (M. Reynolds); "Local Implementation of P.L. 94-142: Similarities and Differences between Rural and Nonrural Local Education Agencies (LEAs)" (A. Wright); and "Problems and Strategies Regarding Regionalizing Service Delivery: Educational Collaboratives in Rural America" (D. Helge). (CL)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

U.S. DEPARTMENT OF EDUCATION
NATIONAL INSTITUTE OF EDUCATION
EDUCATIONAL RESOURCES INFORMATION
CENTER (ERIC)

☑ This document has been reproduced as received from the person or organization originating it.

☐ Minor changes have been made to improve reproduction quality.

- Points of view or opinions stated in this document do not necessarily represent official NIE position or policy.

ED266574

BEST COPY AVAILABLE

INTERORGANIZATIONAL SPECIAL EDUCATION PROGRAMMING IN RURAL AREAS: TECHNICAL REPORT ON THE MULTISITE NATURALISTIC FIELD STUDY

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

VOLUME I

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

Thomas
Skrtic

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

Research Contract No. 400-81-0017 from
the National Institute of Education to the
Department of Special Education
University of Kansas, Lawrence, Kansas 66045

© 1985

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

EC 181738

This report is made pursuant to Contract 400-81-0017. The amount charged to the Department of Education for the work resulting in this report (inclusive of the amount so charged for any prior reports submitted under this contract) is $194,922.77. The names of the person, employed or retained by the Contractor, with managerial or professional responsibilities for such work, or for the content of the report, are as follows: Thomas Skrtic, Earle Knowlton, Egon Guba, Neil Salkind, Edward Meyen, Kathleen Bolland, Stephen Foster, Lynda Schoonmaker.

The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that agency.

TABLE OF CONTENTS

VOLUME I

PART Page

I Introduction 1
- The Problem 1
- The Field Study Research Questions 2
- Overview 4

II Methods 6
- The Emergent Paradigm of Thought and Belief 6
- The Paradigm of Naturalistic Inquiry 10
- Implications for the Doing of Inquiry 14

III Procedures 20
- The Design Update 20
- Site Selection 21
- Procedures for First Visit to Each Site 24
  - Initiating Contact and Gaining Entre 24
  - Sampling Respondents 25
  - Consent Forms 25
  - Logistics 26
  - Interviewing 27
  - Document Collection 30
  - Journal Entries 30
  - Other Activities 31
  - On-Site Team Interactions 32
  - Debriefing 33
- Analyzing Site Visit 1 Data 34
  - Unitizing 34
  - Individual Categorizing 35
  - Team Categorizing 37
- Procedures for Second Visit to Each Site 38
- Analyzing Site Visit 2 Data 40
- Drafting the Case Study 40
  - Indexing the Materials 40
  - Generating an Overall Outline 41
  - Cross-Referencing Materials to the Outline 43
  - Conventions Governing the Writing 44
  - Integrating Themes Drawn from the Research Synthesis 46
  - Developing Questions for Site Visit 3 48
  - Abstracting Problems/Issues and Generating Lessons to be Learned 48
- Internal Review and Revision of the Case Study 49
- Procedures for Third Visit to Each Site 50
  - Selecting the Review Committee 50
  - Delivery of Pre-Visit Packet 51
  - The All-Day Review Meeting 52
  - Interviews with Special Respondents 53
  - Debriefing 54

Final Revision of the Case Study 54
Trustworthiness 55
Counterpart Criteria 55
Operational Techniques for Meeting the Trustworthiness Criteria 57
The Present Study and Trustworthiness 59
Notes on Methodological Issues 62
Some Practical Issues 62
Contract/Paradigm Disjunctions 62
Design Problems 64
Problems in the Field 67
Problems in Writing the Case Study 69
Problems with the Member-Check (Review Committee) Process 73
Some Theoretical Issues 75
The Feasibility and Utility of Trustworthiness Measures 75
Fitting the Naturalistic Paradigm: Was the Right Model Selected to Guide the Inquiry? 78

IV Results 81
Introduction 81
Organizational/Governance Issues 81
Service and Delivery Mechanism Issues 94
Instructional Programs 94
Non-Instructional Services 95
Some Observations 96
Child Find 97
The Staffing (IEP) Process 98
Facilities 102
Private and Parochial Schools 104
Recruitment and Retention 106
Organizing for Service Provision 107
Training 110
Administrative Relationships 112
Parental Involvement 113
Involvement in the IEP/Staffing Process 114
Due Process 115
Effectiveness and Impact Issues 117

V Generality of Findings 134

VI Conclusions and Policy Recommendations 136
Caveats 136
Needs 139
Trade-Offs 141

References 147
Appendix A: Auditor's Report 149
Appendix B: Tables of Interviewees 164

VOLUME II
APPENDIX

C Site #1 Case Study 1-88

D Site #2 Case Study 1-124

VOLUME III
APPENDIX

E Site #3 Case Study 1-66

F Site #4 Case Study 1-134

G Site #5 Case Study 1-43

VOLUME IV
APPENDIX

H Commissioned Papers . . . .

- Special Education in Rural America, Paul A. Worth 1-53
- Dean's Grants Projects and Rural Education, Maynard C. Reynolds 1-50
- Local Implementation of P.L. 94-142: Similarities and Differences Between Rural and Nonrural Local Education Agencies (LEAs), Anne R. Wright 1-19
- Problems and Strategies Regarding Regionalizing Service Delivery: Educational Collaboratives in Rural America, Doris Helge 1-47

LIST OF TABLES

Table Page

1 Changes in Basic Beliefs--Dominant vs. Emergent Paradigm . . 11

PART I

INTRODUCTION

The Problem

Public Law 94-142 is widely heralded as the most significant legislation ever to come out of the Congress of the United States in support of handicapped persons. Its proponents argue that it establishes access to a free and appropriate public education, in the context of education for all, as a right of handicapped persons. And certainly its major elements receive wide support, as principles, from both professional and lay communities. But when these same principles are operationalized, and especially when regulatory guidelines are laid down, they are more likely to be perceived as onerous mandates. A goal displacement quietly occurs in which compliance takes precedence over quality; getting the job done by the book becomes more important than meeting the spirit of the legislation. At least, so it is widely suspected to be.

Rural communities have been especially suspect, and, research seems to suggest, not without reason. Investigators such as Helge (1980) and Blaschke (1979) have identified a number of constraints that apparently make it even more difficult for rural communities than others to implement P.L. 94-142, as for example:

- enormous distances, often exacerbated by weather.
- problems in recruiting and retaining competent staff.
- lack of supportive social and medical services.
- cultural differences, especially strong feelings of local autonomy.
- inability to mount adequate in-service training.
- sparcity of handicapped youngsters, especially low incidence handicapped, that militates against efficient program operation.
- childfind overload.
- tendency of rural parents to defer to the initiatives of the school.
- inadequate funding and resource scarcity generally.

Indeed, these constraints are so powerful that many rural school districts have found it literally impossible to mount programs individually that are even minimally responsive to P.L. 94-142. Virtually all such systems throughout the country have opted to involve themselves in some form of cooperative or collaborative organization--the exact form of which is of course dependent upon the covering laws of the state in which the system is located. Many reasons have been advanced to account for this movement, from:

- the very mundane: school districts form consortia because many small rural districts could not otherwise qualify for the $7,500 minimum entitlement provision of P.L. 94-142; to

- the very altruistic: school districts form consortia because they believe they will be better able to meet the spirit of P.L. 94-142 and provide better services to handicapped youngsters; to

- the more likely and realistic: school districts form consortia because of resource scarcity, especially in light of the requirements of the law; and/or in order to achieve economies of scale (very few rural schools have sufficient numbers of students to develop a comprehensive, specialized program for the handicapped and operate it efficiently); and/or because the scarcity of competent, certified personnel requires "doubling up" in order to utilize this scarce resource efficiently.

Whatever one may choose to believe about motivation for collaboration, two things are very clear: the movement is widespread, and it is little understood whether as a phenomenon in special education or more generally. As is pointed out in the Northwest Regional Educational Laboratory's 1980 literature review:

> Although collaborative efforts in education and other human services hold rich potential rewards, the more relevant current literature cautions that collaborative success will occur only if we clearly understand the potential barriers and the requirements for successful ventures. The literature also acknowledges that we have just begun to pay attention to the nature and characteristics of the collaborative process. As Hall and Nord appropriately comment, ". . . not all collaborative relationships are the same; as a matter of fact, very little is understood about how to establish and maintain working relationships between formal organizations." (pp. 14-15)

The major purpose of this study is to add an increment to existing knowledge about collaborative efforts, and in particular, those efforts directed at the implementation of P.L. 94-142 in rural areas of the United States.

The Field Study Research Questions

The original NIE-promulgated Request for Proposal to which this research was, ultimately, the response, posed certain questions to guide the field portion of the study. As will become clear in the section on methodology which follows, the design which was actually utilized was open-ended (an emergent design) in order to permit a variety of initially unforeseen but clearly important considerations to be dealt with. Nevertheless the RFP questions were sufficiently broad that it was possible to use them as overall guides. This report will subsequently deal with these questions in essentially unchanged form, although some alterations have been made in the interest of coherence, uniformity, and logic.

Organizational/Governance Issues

1. Describe the membership and structure of the cooperative arrangement, how local agencies become members or obtain services, and what the incentives and disincentives are for participation. What factors influence board support of membership?

2. Describe the governance structure in terms of composition and role of the board of directors, the roles of any advisory committees which exist for special education services, or other means by which local agency personnel or the public are involved in decision-making.

3. Describe the major sources of funding for special education services and for the unit as a whole.

4. Describe the relationship of the multi-district organization, similar units within the state, and the SEA.

Service and Delivery Mechanism Issues

1. Describe the types of special education services available, and how they are provided to students with different types and levels of handicapping conditions.

2. How are services monitored from the perspectives of both the LEA and the intermediate agency? What monitoring patterns appear most effective given the contexts of the particular sites?

3. What are the procedures for hiring, training, and organizing personnel for intermediate agencies? What is the administrative relationship among IEU staff, LEA staff, and programs offered?

4. How are parental involvement and due process provisions carried out within an intermediate agency?

5. What are the provisions for related services in intermediate agencies? Is there a relationship between general health care and social resources available in rural communities and the extent and quality of special services provided handicapped students?

6. How are the service costs allocated to member LEAs?

Effectiveness and Impact Issues

1. Assess any evidence on the quality and quantity of services delivered by the cooperative mechanisms in terms of the major requirements of P.L. 94-142.

2. Describe the perceptions of school personnel, parents, community leadership, and other relevant actors of the costs and benefits of the collaborative arrangement.

3. Describe any equity issues involved in the operation of the multi-district unit, such as distance or travel time for different local districts to obtain services, impact of the funding or cost formula utilized, ability of member or non-member districts to obtain equivalent services within a given state.

Overview

The remainder of this technical report is divided into six parts, as follows:

Part II: Methods. The general methodology that was followed in this case study portion of the investigation was that of naturalistic inquiry as outlined by Guba (1978, 1981) and Guba and Lincoln (1981, 1982). Since this approach differs in fundamental ways from the predominant paradigm typically found in educational research, more than usual attention is paid to its rationale and application. A case is made in this part for this choice of paradigm.

Part III: Procedures. This part is concerned with the actual operations followed in carrying out the study. Considerations of site selection, arrangements for the actual site visits, data analysis, preparation of the case studies, field checks of their content, and trustworthiness issues are discussed. Included also is a section dealing with problems generated by the naturalistic method.

Part IV: Results. The target issues and questions are used as the focus for examining the data resulting from the five separate case studies.

Part V: Generality of Findings. As will be seen, the problem of generalization is related to one of the key assumptions of naturalistic inquiry; hence the topic of generality of findings takes on a special caste. The findings are examined from the perspective of identifying those parameters that can be used by readers who might wish to make applications elsewhere.

Part VI: Conclusions and Policy Recommendations. The major policy recommendations emanating from the overall study (including the research synthesis) are made in Volume 3 of the final report series. In this part those policy questions clearly raised by the field study data are described, and, insofar as solutions have been found to exist in the sites, these are included.

The Appendix: The Five Separate Case Studies. The individual case studies are included in unabridged form as Appendices C through G (Volumes II and III). These cases may be used by the reader in several ways:

a. As background reading for an understanding of the remainder of this report.

b. As a "data bank" against which the validity of the report and the assertions made in it may be checked--a kind of reader "audit."

c. As a source of ideas for applications in other settings. The reader with this purpose in mind is urged to select that case whose context is most similar to his or her own and rely primarily on it, rather than to look for generalizations across all cases that might hold anywhere. The latter perspective, the reader will appreciate after reading Part II on methods, is epistemologically suspect and unsafe.

PART II

METHODS

The methods used in the field study portion of this investigation are those of the naturalistic paradigm or model of inquiry. Since this model is somewhat unconventional, and, in some ways, at sharp issue with the prevailing, dominant, or conventional model of research, it is useful to devote some time at the beginning to a discussion of why the naturalistic model was chosen and why it is thought to be superior to the conventional model for the purposes addressed in this particular investigation. Briefly, the argument is this: that there is emerging, not only in educational research but in virtually every discipline imaginable, a new paradigm of thought whose epistemological assumptions are very different from those of the past (the reader may find it convenient to imagine that the entire conceptual world is in the midst of a paradigm revolution in the sense that the term has been popularized by Kuhn, 1962); that the methodological assumptions undergirding the dominant paradigm of inquiry are more consistent, or *more resonant with*, the older mode of thought than with the newer; that therefore a mode of inquiry more resonant with emergent concepts is required; and that the so-called naturalistic paradigm provides a better fit--a higher degree of resonance (but by no means perfect resonance)--than the conventional paradigm. To put it another way, newer ways of conceptualizing the world require modes of inquiry that are consistent with and rest on the same set of basic assumptions. Otherwise, to draw an analogy, we may find ourselves pursuing the problems of chemistry with the methods of alchemy.

The Emergent Paradigm of Thought and Belief

Julienne Ford, in her whimsical but powerful book, *Paradigms and Fairy Tales* (1975), makes the point that when one describes something as "true," one might intend four different meanings of "truth." T_1 is *meta-physical truth*, the set of basic beliefs which we take for granted in a shared way. Because T_1 truths represent the ultimate benchmark against which everything else will be tested, *they cannot themselves be tested*, for, if there were something more fundamental against which a test might be made, then that more fundamental entity would become *the* basic belief whose truth T_1 must be taken for granted. No T_1 truth can ever be *either* proven *or* falsified, Ford points out.

T_2 is *ethical truth*, a truth based on interpersonal trust; thus one scientist accepts the data proferred by another because of the interpersonal trust they share.[1] T_3 is *logical truth*, that is, an assertion or predicate can be shown to be T_3 if it is logically or mathematically consistent with some other assertion or predicate known to be true or with some basic belief, that is, a T_1. T_4 is *empirical truth*, that is, an assertion or predicate that is found to be consistent with "nature" (or, as Ford puts it, "is found to preserve the appearances"). It might be noted in passing that the conventional paradigm requires stating assertions or predicates which can be shown, logically or mathematically, to be T_3, and testing them empirically to determine if they are T_4. A further presumption of the conventional paradigm is that when the assertions or predicates (commonly called hypotheses) are reduced (T_3) from a theory, they are chosen in ways that will subject the theory to the maximum risk of *falsification* (Popper, 1968), and that, if found to "preserve the appearances," they will add (inductively) to the credibility of the theory.

---

[1] The wisdom of taking T_2 on faith is all too frequently called into question, however, as we discover that one or another well-known scientist has "fudged" his or her data.

But the reader should not lose sight of the fact that whether one operates within this conventional paradigm or any other paradigm, undergirding each of them is a set of *basic beliefs* that are taken to be T_1 and which cannot be proven either true or false. This set of basic beliefs can be thought of as representing a particular set of glasses through which the world can be viewed, but these glasses have the peculiar property that, while they may enhance the clarity with which *some* things can be viewed, they make it utterly impossible to view certain others. Each paradigm, so to speak, sets certain constraints on the thinker; to get outside the system requires the use of a *different* paradigm.

Peter Schwartz and James Ogilvy, in a brilliant monograph entitled, *The Emergent Paradigm: Changing Patterns of Thought and Belief* (1979), have analyzed the set of basic beliefs that has characterized human thought in the past; and, by drawing upon a variety of disciplines including physics, chemistry, brain theory, ecology, evolution, mathematics, philosophy, politics, psychology, linguistics, religion, consciousness, and the arts, proposed a new set of parameters that characterize emergent thought, that is, the emergent paradigm. These terms, old and new, are summarized in Table 2. Some quotations below illustrate the meaning which they ascribe to these terms:

1. *From simple to complex*:

> The task of most knowledge processes has been to reduce that which is studied to its elements and simplest relationships. These are called fundamentals and basic laws. . . . We can no longer treat the actual word as simple; . . . diversity, interaction; and open systems are the nature of things. The world is composed of diverse things, all of which interact; and it is in principle impossible to separate a thing from its interactive environment. (pp. 10-12)

2. *From hierarchy to heterarchy*.

> The old conception of order was hierarchical; there exists a "pecking order," a chain of command, higher- and lower-order principles, and so on. The emergent order is heterarchical. There may be vertical orderings, but there are many on a comparable level; there is no one person, principle, or object at the top of everything.

TABLE 1

CHANGES IN BASIC BELIEFS-- CONVENTIONAL VS. EMERGENT PARADIGM*

Conventional Paradigm	Emergent Paradigm
From:	Toward:
Simple	Complex
Hierarchy	Heterarchy
Mechanical	Holographic
Determinate	Indeterminate
Linearly Causal	Mutually Causal
Assembly	Morphogenesis
Objective	Perspective

*Based on Schwartz and Ogilvy (1979)

> There may be many peaks to these pyramids, and which one comes into play and its relationship to the others depend on the situation. (p. 13)

3. From mechanical to holographic.

> The relationships among parts were once found in analogies to simple machines such as the lever. . . . A more useful metaphor may be the hologram. With the holographic metaphor come several important attributes. We find that the image in the hologram is created by a dynamic process of interaction and differentiation. We find that information is distributed throughout--that at each point information about the whole is contained in the part. . . . everything is interconnected . . . , having been generated by the same dynamic process and containing the whole in the part. (pp. 13-14)

4. From determinate to indeterminate.

> The success of the mechanistic description of the actual world gave a strong foundation to the argument for a

deterministic view of the world. . . . Those simplistic notions were laid to rest by Heisenberg's Indeterminacy Principle, which tells us that (1) at a subatomic level the future state of a particle is in principle not predictable, and (2) that act of experimentation to find its state will itself determine the observed state. Qualitatively, the implication of this is that there are no causal linkages between past, present, and future; rather, in complex systems possibilities can be known but precise outcomes cannot be predicted. It means that ambiguity about the future is the state of nature. (p. 14)

5. From linear toward mutual causality.

The indeterminacy in nature is mirrored in the evolution of causal models. The simplest causal model is linear; that is, a simple action always leads to the same predictable result. Thermodynamics introduced probabilities into causality . . . . Cybernetics gave us feedback, but with a concentration on negative feedback. . . . Such a system tends toward stability. The new paradigm adds positive feedback, which means that the feedback signal from B affects A in a fashion such that A tends to increase B. In the simplest and most negative form that is called a vicious circle. However, when it is of mutual benefit for both A and B, then it is like symbiosis. Both A and B evolve and change together, each affecting the other in such a way as to make the distinction between cause and effect meaningless. (p. 14)

6. From assembly toward morphogenesis.

Our old metaphor for change is that of a construction project. We have components being assembled according to a plan with a predictable outcome . . . . [But] if a system is complex . . . and . . . open to external inputs, then it can change morphogenetically. A new form, unpredicted by any of its parts, can arise in such a system. . . . However, not just any form is possible. The components constrain, but they do not determine the exact form. . . . The requirements for morphogenesis are diversity, openness, complexity, mutual causality, and indeterminacy. When these conditions exist, we have the ingredients for qualitative change. That process can be described reasonably rigorously by Rene Thom's catastrophe theory. (p. 14)

7. From objective toward perspective.

Until this century, we were taught to believe that the way to know about the world was to stand outside it somehow and observe it objectively. We assumed that our mental processes, our experimental instruments, and our disciplines were neutral. But we've discovered that none

> of these are neutral to the world. . . . If objectivity is an illusion, is subjectivity the only alternative? We suggest that perspective is a more useful concept. Perspective connotes a view at a distance from a particular focus. Where we look from affects what we see. This means that any one focus or observation gives only a partial result; no single discipline ever gives a complete picture. (p. 15)

These seven terms, then--complexity, heterarchy, holographic, indeterminacy, mutual causality, morphogenesis, and perspective--describe, Schwartz and Ogilvy assert, the major parameters or characteristics or axioms of the emergent paradigm. Their analysis is too well bolstered by allusion to the many fields on which they draw to brook many objections. And the fact that vanguard thinking in all of these disciplines--from so many perspectives--should converge, is compelling and impressive.

Schwartz and Ogilvy go on, in their monograph, to discuss the implications of the "new" way of thinking for a variety of practical areas: mechanisms of change, the individual, society, politics, science and technology, and business (with separate treatment of management, personnel, markets, products, regulation and public attitudes, and goals). Surprisingly, they do _not_ deal explicitly with the area of research methodology. But this area of application is of course extremely important. There can be little doubt that the _old_ paradigm of _inquiry_, perhaps best characterized as positivistic, served researchers operating from the _old_ paradigm of _thought_ very well. The way of thinking about the world and the way of inquiring into it proceeded from parallel assumptions; they were resonant, as it were. But if the _new_ paradigm of _thought_ is now to become predominant, is it not necessary to devise a parallel _new_ paradigm of _inquiry_?

The Paradigm of Naturalistic Inquiry

While a paradigm that approximates the requirements for a _new_ paradigm has been known and utilized for more than a half-century--the ethnographic--it is only during the past decade (more or less) that it has emerged as a serious competitor to the conventional paradigm in the social sciences such as psychology and sociology. The new paradigm is often mistakenly characterized as the qualitative paradigm, or the case study paradigm, but neither of these designations captures the full significance of the fact that it essentially proceeds from a fundamentally different ontological and epistemological perspective. A good deal more is at stake than merely the nature of the data to be collected or the form of reporting to be used.

For the purposes of this investigation we have leaned heavily on the exposition of the naturalistic paradigm offered by Guba (1978, 1981) and Guba and Lincoln (1981, 1982). Their description of the assumptions undergirding the dominant paradigm agree essentially with those offered by other authors (Douglas, 1976; Ford, 1975; Hesse, 1980; Brewer and Collins, 1981; Reason and Rowan, 1981). In their analysis, the essential differences between the axioms of the conventional and naturalistic paradigms are five in number:[1]

1. The nature of reality:

   Conventional version: There is a single, tangible reality fragmentable into independent variables and processes, any of which can be studied independently of the others; inquiry can converge onto this reality until, finally, it can be predicted and controlled.

   Naturalistic version: There are multiple, intangible realities which can be studied only wholistically; prediction and control are unlikely outcomes although some level of understanding can be achieved.

2. The inquirer-object (or respondent) relationship:

   Conventional version: The inquirer is able to maintain a discrete distance between himself and the object of inquiry.

   Naturalistic version: The inquirer and the object interact to influence one another; especially is this mutual interaction present when the object of inquiry is another human (respondent).

3. The nature of truth statements:

   Conventional version: The aim of inquiry is to develop a nomthetic body of knowledge; this knowledge is best encapsulated in generalizations which are truth statements of enduring value that are context-free; the stuff of which generalizations are made is similarities among units.

   Naturalistic version: The aim of inquiry is to develop an idiographic body of knowledge; this knowledge is best encapsulated in a series of "working hypotheses" that describe the individual case; differences are as inherently interesting as (and at times more so than) similarities.

4. Attribution/explanation of action:

   Conventional version: Every action can be explained as the result (effect) of a real cause that precedes the effect temporally (or is at least simultaneous with it).

   Naturalistic version: An action may be explainable in terms of multiple interacting factors, events, and processes that shape it and are part of it; inquirers can, at best, establish plausible inferences about the patterns and webs of such shaping in any given case.

---

[1] The presentation here is essentially that found in Guba and Lincoln, 1982.

5. The role of values in inquiry:

Conventional version: Inquiry is value-free and can be guaranteed to be so by virtue of the objective methodology which is employed.

Naturalistic version: Inquiry is value bound in at least five ways:

- through the inquirer's values, which influence such things as the choice of a problem, the methods employed, etc.
- through the choice of paradigm (for example, conventional vs. naturalistic).
- through the choice of substantive theory.
- through the values that inhere in the context (the community, the respondents, etc.).
- through conflicts or reinforcements among any of the above (dissonant or resonant values). (The argument of this Methods section so far may be understood to be dealing with this question: the need to select any inquiry paradigm whose assumptions are resonant with the ontological assumptions involved.)

It is beyond the scope of this report to justify these axioms as more valid for guiding 20th Century inquiry than those of the conventional paradigm; the interested reader is referred particularly to Guba and Lincoln (1982). What is of import here is that the naturalistic axioms are at once more consistent (resonant) with the Schwartz and Ogilvy seven parameters as well as better supported by them than the conventional axioms. So for example:

On reality: the naturalistic paradigm is supported by the ideas of complexity (systems and organisms cannot be separated from their environments because their meaning and their very existence depends on their interactions with other systems and organisms; as systems and organisms become more complex, they develop unique properties--the whole is more than the sum of the parts; systems and organisms cannot be decomposed--fragmented--into individual elements--parts--because their unique systemic and organic properties transcend the elements--parts); of heterarchy (the order we experience is a function of the activity of ordering performed by the mind; all apparently "real" orders are also determined by a mental ordering activity); of holography (information is distributed throughout the system rather than being concentrated at specific points; at each point information about the whole is contained in the part; everything is interconnected); of mutual causality (the universe in an interconnected network, an indivisible whole); and of perspective (where and how one looks at systems and organisms affects what will be seen; the knower's perspective is crucial in determining what is known; any one focus of observation provides only one perspective, so that no discipline gives a complete picture and all knowledge is at best partial; one form of knowledge or method cannot be reduced into another).

On inquirer-object (respondent) relationship: the naturalistic paradigm is supported by the ideas of indeterminacy (there is a reciprocal relationship between the knower and the known; the nature of the observation process affects the results, so that measurements are determined by the relationship between the observer and the observed); and of perspective (where and how one looks at systems and organisms affects what will be seen; the knower's perspective is crucial in determining what is known; knowledge is protected not by abstracting from all perspective--the claim for objectivity--but by balancing multiple perspectives to constrain bias--the claim for fairness).

On the nature of truth statements: the naturalistic paradigm is supported by the ideas of complexity (holism is vindicated over atomism and diversity over uniformity); of heterarchy (different individuals tend to experience the same order because all rational creatures order experience using the same intrinsic categories--a shared paradigm); of holography (what is detected in any part must characterize the whole); of indeterminacy (in complex systems and organisms, future possibilities can be known but precise outcomes cannot be predicted, that is, predictability is replaced by probability); by mutual causality (to completely understand a system or organism requires knowing its history, which cannot be completely known from its present condition; mutual causality in complex systems and organisms tends to produce unpredictable results); and of morphogenesis (change is not only continuous and quantitative but discontinuous and qualitative).

On attribution/explanation of action: the naturalistic paradigm is supported by the ideas of heterarchy (structures of systems and organisms operate heterarchically, creating a net of mutual constraints and influences); of holography (everything is interconnected); of indeterminacy (not everything is possible but among the possibilities choices do affect outcomes); of mutual causality (there is a complex of mutually interacting "causes" leading to a particular outcome; the universe is an interconnected network, an indivisible whole); and of morphogenesis (new and complex systems and organisms arise out of old through a complex process that amplifies deviation through reciprocal causality--positive feedback and feedforward--and through interactions with the surrounding environment; fluctuations in a system or organism interact, affecting each other and mutually causing wholly new systems and organisms to arise; more highly ordered systems and organisms are produced from less highly ordered, simple systems and organisms so that order can arise even from disorder; components constrain but do not determine emergent form in morphogenetic change).

On the role of values in inquiry: the naturalistic paradigm is supported by the ideas of perspective (where and how one looks at systems and organisms affects what will be seen; the knower's perspective is crucial in determining what is known; what we believe about systems and organisms determines much of what we see--believing is seeing; knowledge is protected not by abstracting from all perspectives--the claim of objectivity--but by balancing multiple perspectives to constrain bias--the claim of fairness; publicly shared reality is not unchanging, i.e., objective--what is taken to be reality shifts as shared paradigms shift; the concept of paradigm shift--itself a kind of pespectival reorientation--opens the possibility of an almost limitless proliferation of research programs based on widely different assumptions).

The present study may be conceived as one of those "new" research programs based on different assumptions. By now it should be clear that the selection of the new inquiry paradigm as the basis for this research is neither random nor whimsical; nor has the paradigm been selected simply because a case study (or qualitative) approach might provide a useful complement to those approaches that have been or may be carried out in more conventional ways. THE PARADIGM OF NATURALISTIC INQUIRY HAS BEEN SELECTED BECAUSE IT REPRESENTS THE BEST FIT, PROVIDES THE GREATEST RESONANCE, IS MOST CONGENIAL TO EMERGENT, VANGUARD WAYS OF VIEWING THE WORLD THAT HAVE BEGUN TO CHARACTERIZE VIRTUALLY EVERY MAJOR BASIC AND APPLIED DISCIPLINE EXTANT.

Implications for the Doing of Inquiry

Advocates of naturalistic inquiry of course cannot do research armed only with a different set of undergirding assumptions or basic beliefs. But this set of axioms does have enormous implications for how research is actually carried out. In this section we propose to indicate some of the more important implications of this paradigm for actual research operations. The importance of these modes will be more fully appreciated as this study is described in greater detail in subsequent sections of this technical report.

We shall discuss thirteen characteristics of operational naturalistic inquiry. These characteristics can be justified in two ways: (1) by their logical dependence on the axioms the undergird the system, and (2) by their coherence one with another. These thirteen characteristics in fact display a synergism such that, once one is selected, the others more or less fall into line. Some attempt will be made in the paragraphs that follows to demonstrate these claims.

With respect to the axioms:

Characteristic 1: Natural Setting. N (the Naturalist) elects to carry out research in the natural setting or context of the entity which he proposes to study because: his ontology suggests that realities are multiple wholes which cannot be understood in isolation from their contexts nor can they be fragmented for separate study of parts (the whole is more than the sum of the parts); because he believes that the very act of observation will influence what is seen, and he prefers his own interaction to take place with the entity-in-context for fullest understanding; because he believes that context is crucial in deciding whether or not a finding may have meaning in some other context for fullest understanding; because he believes the context is crucial in deciding whether or not a finding may have meaning in some other context as well; because he believes in complex mutual shaping rather than linear causation and therefore feels he must see the pheonomenon in its full-scale influential (force) field; and because contextual value structures are at least partly determinative of what will be found.

Characteristic 2: Emergent Design. N elects to allow the research design to emerge (flow, cascade, unfold) rather than to construct it a priori because it is inconceivable that he could know enough ahead of time about the many multiple realities to devise the design adequately; because he knows that what will emerge is a function of his interaction with the phenomenon which is largely unpredictable in advance; because he cannot know sufficiently well the patterns of mutual shaping that are likely to exist; and because the various value systems involved (including his own) interact in unpredictable ways to influence the outcome.

Characteristic 3: Human Instrument. N elects to use himself and other humans as the primary data-gathering instruments (as opposed to paper and pencil or brass instruments) because it would be virtually impossible to build a non-human instrument with sufficient adaptability to encompass the variety of realities to be encountered; because he understands that all instruments interact with respondents and objects but that only the human instrument is capable of grasping and evaluating the meaning of that differential interaction; because the intrusion of instruments intervenes in the mutual shaping of other elements and that shaping can be appreciated and evaluated only by a human; and because all instruments are value-based and interact with local values but only the human is in a position to identify and take into account (to some extent) those resulting biases.[1]

Characteristic 4: Qualitative Methods. N elects qualitative methods over quantitative because they are more adaptable to dealing with multiple (and less aggregatable) realities; because such methods expose more directly the nature of the transaction between investigator and respondent (or object) and hence make easier an assessment of the extent to which the phenomenon is described (or biased by) the investigator's own posture; and because qualitative methods are more sensitive to and adaptable to the many mutually-shaping influences and value patterns that may be encountered.

Characteristic 5: Utilization of Tacit Knowledge. N argues for the legitimation of tacit (intuitive, felt) knowledge in addition to propositional knowledge (knowledge expressible in language form) because often the nuances of the multiple realities can be appreciated only in this way; because much of the interaction between investigator and respondent or object occurs at this level; and because tacit knowledge mirrors more fairly and accurately the value patterns of the investigator himself.

---

[1] Hofstadter (1979) points out that adaptability and perfectability stand in close trade-off to one another--the more perfect an instrument is, the less adaptable. The human, far from perfect, in virtually infinitely adaptable.

Characteristic 6: Grounded Theory. N prefers to have his guiding substantive theory emerge from (be grounded in) the data because no a priori theory could possibly encompass the multiple realities that are likely to be encountered; because believing is seeing and N wishes to enter his transactions with respondents as neutrally as possible[1]; because a priori theory is likely to be built on a priori generalizations which, while they may make nomothetic sense, may provide a poor idiographic fit to the situation encountered; because the mutual shapings found in a particular context may be explicable only in terms of the contextual elements found there; and because grounded theory is most likely to be responsive to contextual values (and not merely to investigator values).

Characteristic 7: Inductive Data Analysis. N prefers inductive (to deductive) data analysis because that process is more likely to identify the multiple realitites to be found in those data; because such analysis is more likely to make the investigator-respondent (or object) interaction explicit, recognizeable, and accountable; because this process is more likely to describe the setting fully and make decisions about transferability to other settings easier; because inductive data analysis is more likely to identify the mutually shaping influences that interact; and because values can be an explicit part of the analytic structure.

Characteristic 8: Purposive Sampling. N is likely to eschew random or representative sampling in favor of purposive or theoretical sampling because he thereby increases the scope or range of data exposed and increases the likelihood that the full range of multiple realitites will be uncovered; and because purposive sampling can be pursued in ways that will maximize the investigator's ability to devise grounded theory that takes adequate account of local conditions (for possible transferability), local mutual shapings, and local values.

Characteristic 9: Problem-determined Boundaries. N is more likely to set boundaries to his inquiry on the basis of the emergent problems (rather than on the basis of a priori or theoretical specification) because that permits the multiple realities to define the problem (rather than preconceptions); because problem setting can be more closely mediated by the investigator-problem interaction; because boundaries cannot be satisfactorily set without intimate contextual knowledge including knowledge about the mutually shaping factors involved; and because problems have no meaning in any event in abstraction from the local (and investigator) value systems.

Characteristic 10: Idiographic Interpretation. N is inclined to interpret his data (including drawing conclusions) idiographically (in terms of the particulars of the case) rather than nomothetically (in terms of law-like generalizations) because different interpretations are likely to be meaningful for different realities; and because interpretations depend so heavily for their validity on local particulars including the particular investigator-respondent (or object) interaction, the contextual factors involved, the local mutually-shaping factors influencing one another, and the local (as well as investigator) values.

---

[1] That is, in open-minded but not empty-headed fashion.

Characteristic 11: Tentative Application. N is likely to be tentative (hesitant) about making broad application of his findings because realities are multiple and different; because the findings are to some extent dependent upon the particular interaction between investigator and respondents (or object) which may not be duplicated elsewhere; because the extent to which the findings may be applicable elsewhere depends on the empirical similarity of sending and receiving contexts; because the particular "mix" of mutually-shaping influences may vary markedly from setting to setting; and because value systems, especially contextual values, may be sharply at variance.

Characteristic 12: Case Study Reporting Mode. N is likely to prefer the case study reporting mode (over the scientific or technical report) because it is more adapted to a description of the multiple realities found at any given site; because it is adaptable to demonstrating the investigator's interaction with the site and consequent biases that may result (reflexive reporting); because it provides the basis for both individual "naturalistic generalizations" (Stake, 1980) and transferability to other sites (thick description); because it can picture the value positions of investigator, substantive theory, methodological paradigm, and local contextual values.

Characteristic 13: Special Criteria for Trustworthiness. N is likely to find the conventional trustworthiness criteria (internal and external validity, reliability, and objectivity) appropriate in principle but inconsistent with the axioms and procedures of naturalistic inquiry; hence he is likely to define new (but analogous) criteria and devise operational procedures for applying them. More will be said of these criteria and methods in a later section; here it is simply worth noting that the conventional criterion of internal validity fails N because it implies an isomorphism between research outcome and a single, tangible reality onto which inquiry can converge; that the criterion of external validity fails because it is inconsistent with the basic axiom concerning generalizability; that the criterion of reliability fails because it requires absolute stability and replicability, neither of which is appropriate for a paradigm based on emergent design; and that the criterion of objectivity fails because the paradigm openly admits investigator-respondent (or object) interaction and the role of values. The case will later be made that there exist substitute criteria (credibility, transferability, dependability, and confirmability), and corresponding empirical procedures, that adequately (if not absolutely) affirm the trustworthiness of naturalistic approaches.

With respect to synergism among the characteristics:

A second basis for claiming that the above list of thirteen characteristics is justifiable for naturalistic inquiry is the fact that they display a remarkable coherence and inter-dependence. A simple illustration will suffice to make the point that each is a raison d'etre for the others, and the exclusion of any one of them would seriously damage the others:

In doing research from a naturalistic perspective, N is forced into the natural setting because he cannot specify, without an a priori theory or hypotheses, what is important to control or even to study. Until he has spent some time in the setting he cannot specify his problem even in a rudimentary form, or bound it. He could not design a contrived study because he would not know what to contrive or control. If theory is to be grounded in data, those data must first be located and analyzed inductively. Since N cannot specify the precise form of the data to be sought, he must fall back on an open-ended, adaptive instrument: the human being, who, like the "smart bomb," can identify and hone in on (purposefully sample) the target without having been precisely pre-programmed to strike it. Humans find certain data collection means more congenial than others; they tend toward the use of qualitative methods that "extend" human senses: seing, hearing, and tacit "sixth sensing" that lead one to observation, interview, documentary analysis, and the like. These methods result in insights and information about the sending context so that the extent of transferability and applicability in some other receiving context may be judged. No aggregations, no generalizations, no cause-effect statements can emerge but only idiographic interpretations; hence, there is an air of tentativeness surrounding any proposed application. Finally, the case-study mode lends itself well to the full description that will be required to encompass all of these facets and make possible understanding on the part of a reader (building on his own tacit knowledge and making "naturalistic generalizations" possible). Judgments about the trustworthiness of such a process cannot be made with conventional criteria; criteria devised especially for and demonstrably appropriate to naturalistic inquiry are required.

The present study was carried out with all of these implications in mind. The remainder of this report assumes that the reader is familiar with their meaning. The reported research should be judged on the basis of its conformity to these principles and its satisfaction of appropriate traustworthiness criteria. The reader is not required to agree with the naturalistic paradigm but only to understand its implications. Responsive (and responsible) criticism can take only one of two forms:

- to assert that the work was carried out in ways inconsistent with the naturalistic axioms and their implications; or
- to assert that the axioms themselves are invalid on some grounds.

Criticisms of the first kind are empirical in nature and require support by reference to the research operations and findings. Criticisms of the second kind are metaphysical and probably have no place except in epistemological discussions. Or, to return to where we began, with Julienne Ford, criticisms of the first kind are directed toward issues of T_3 (logical truth) and T_4 (empirical truth) while criticisms of the second kind are directed toward T_1. And as Ford has so eloquently argued, basic beliefs cannot be demonstrated T_1; they can only be accepted or rejected. But of course, they cannot be demonstrated $False_1$ either!

PART III: PROCEDURES

This Part outlines the operational procedures used in carrying out the field study portion of the research. A number of matters are covered, including: design update, site selection, arrangements for the three visits made to each site, data analysis, drafting the case study, internal and field site reviews of the draft, and steps taken to assure trustworthiness of the data. A final section outlines a number of methodological problems that arose because of the application of the naturalistic paradigm, and makes suggestions on how to handle them in future research.

The Design Update

In response to the request of the NIE project officer, the research staff prepared an updated version of the research plan (submitted July 2, 1981) that would take account of two developments that had occurred since submission of the original proposal: (1) new concepts and information that had emerged as a result of dealing with the clarification questions raised by NIE, and (2) advances in thinking on the part of project staff regarding the means of application of the naturalistic paradigm.

In this so-called Revised Plan, the purpose of the study was described as being two-fold: "To increase our knowledge of how special education services are delivered through a variety of inter-agency mechanisms, and to draw together findings on rural district implementation of P.L. 94-142 from a variety of other completed and ongoing studies." The first purpose was to be addressed through the field studies and the second through the research synthesis activities. So far as the field studies portion was concerned, the Revised Plan suggested that it would be bounded by three elements: the parameters of the problem under study, the initial stipulations of the sponsor of the study (i.e., NIE), and "the emergent design or recycling process common to all naturalistic inquiry."

The parameters of the problem were discussed along five dimensions: special education prior to P.L. 94-142; rural education (including especially geography and financing); rural special education; inter-agency collaboratives; and the change/innovation process. Initial sponsor stipulations were taken to be those included in the RFP as well as others generated in conversations between the research staff and the NIE project officer. The questions of interest resulting from all of the preceding are essentially those outlined in Table 1 of Part I. Changes arising because of the emergent design could of course not be stipulated in advance (although they will become clear in the remainder of this Part).

The Revised Plan contained, in addition to the above, detailed discussion of site selection requirements and criteria, the methodological stance of the research (essentially as reviewed in Part II of this report), and the processes to be utilized for the research synthesis and policy implications elements (which are not germane to this technical report). A final section dealt with management issues.

Before settling on the features of the research outlined in the Revised Plan, the staff determined to submit it for the consideration of the National Advisory Committee.[1] Sections of the Plan were sent to committee members in late July, 1981, in preparation for the meeting held in Lawrence on August 20-21, 1981. Members were asked to critique the Revised Plan as well as to prepare position statements in relation to one or more of several topical sessions to which they were assigned. For example, the National Rural Project (NRP) addressed Perspectives on Rural Special Education, Collaborative Arrangements, and P.L. 94-142 in Rural States; and the Stanford Research Institute (SRI) addressed Perspectives on Rural P.L. 94-142, Organizational Change and Innovation, and P.L. 94-142 in Rural Cooperatives.

The two day discussion resulted in a good deal of clarification of concepts both on the part of NAC members and the project staff, but focused almost entirely, when it came to suggestions for operational steps, on the site selection process. Indeed, the single follow-up task resulting from the meeting was concerned entirely with identification of criteria for site selection; this task will be reviewed in the section on "Site Selection" that follows. Essentially, then, the research design as outlined in the Revised Plan was affirmed and ratified as the initial point of departure for the field study work.

Site Selection

Five sites were finally included in the study. While the original RFP called only for five sites, the Revised Plan amended that number to eight--a sizeable overestimate of what would be possible, as it turned out. Numbers were again reduced through negotiations with the NIE project officer (and through him, with the NIE fiscal officer) as it became apparent that eight sites were beyond the resources of the project; first to seven, then to six, and finally back to the original five sites.

---

[1] The members of the National Advisory Council were: Dr. Doris Helge, Murray State University, Director of the National Rural Project; Dr. Clifford Howe, Chairman, Division of Special Education, the University of Iowa; Dr. James Jess, Superintendent, Cal Community Schools, Latimer, Iowa; Mr. Lloyd Lockwood, Director, Central Kansas Educational Cooperative, Salina, Kansas; Dr. Cecil Miskel, then in the Department of Educational Policy and Administration, University of Kansas, and currently Dean, School of Education, University of Utah; Dr. Judy Schrag, Assistant Superintendent, Special Services, Office of State Superintendent of Public Instruction, Washington; Dr. Marian Stearns, SRI International, Menlo Park, California; Dr. Anne R. Wright, SRI International, Menlo Park, California; Dr. Noble Gividen, Director, Southeast Arkansas Educational Cooperative, Monticello, Arkansas; Dr. Yvonna S. Lincoln, Department of Educational Policy and Administration, University of Kansas.

The question of site selection was, as it turned out, the most troublesome of the methodological questions faced by the research staff. Case research is often attacked on the grounds that it results cannot be generalized precisely because a small number of sites can hardly be claimed to be representative of anything. The project staff had to overcome this bias, from its wellwishers (including themselves) as well as from its critics, in order to maintain the integrity of the naturalistic paradigm that had been adopted. That paradigm not only takes a disinterested posture with respect to representativeness but makes a strong statement against generalization (in the usual sense). The sampling was to be purposeful, not statistical. The major issue thus became to determine carefully just what the purpose of sampling was to be.

Michael Quinn Patton, in his discussion of purposive (or theoretical) sampling (Qualitative Evaluation Methods, Sage, 1980, p. 105 ff.) suggests that there are at least six types of such sampling: sampling extreme or deviant cases, when the purpose is to obtain information about unusual cases that may be particularly troublesome or enlightening; sampling typical cases, when the purpose is to avoid rejection of information on the grounds that it is known to arise from special or deviant cases; maximum variation sampling, when the purpose is to document unique variations that have emerged in adapting to different conditions; sampling critical cases, when the purpose is to permit maximum application of information to other cases because, if it's true of critical cases, it is also likely to be true of all other cases; sampling politically important or sensitive cases, when the purpose is to attract attention to the study; and convenience sampling, when the purpose is to save time, money, or effort.

It seemed apparent to the staff that both maximum variation sampling and critical case sampling might appropriately serve the objectives of the study as proposed. In order to manage critical case sampling, however, critical cases have to be identified, and the bases for labeling them "critical" must be precisely determined. Neither of these conditions could be met given the present state of knowledge. For maximum variation sampling, on the other hand, the only information required is the status of sampling units with respect to variable factors of interest. Given these considerations, the staff fixed upon maximum variation sampling as the preferred mode, and turned its attention to the identification of the factors to be taken into account.

Before turning to a consideration of these factors, however, it is important to note that if maximum variation is to be achieved, it is important to select sites serially, that is, not to select later sites until earlier ones have not only been identified by at least preliminarily explored. When site 1's characteristics are well known, for example, site 2 can be selected to pose as great a contrast to 1 as possible, and so on. Time precluded the selection of eight sites (as originally intended) in full serial order, that is, one at a time, but it was decided to select one site; then, when it had been explored, to select sites 2 and 3, then sites 4 and 5 culminating with sites 6, 7, and 8 at the end. As noted, only five sites were finally included, but they were selected serially in the order 1:2-3:4-5.

Selection Factors. The staff began on this task in a twofold manner: by searching relevant literature, and by involving a group of knowledgeable consultants. Of special utility among items in the literature were H. S. Davis's *Educational Service Centers in the U.S.A.* (New Haven, Connecticut: Connecticut State Department of Education, 1976); the four volume report published by Stephens Associates (1979) which included: *Education Service Agencies: Status and Trends*, *The Establishment and Abolition of a Statewide System of Education Service Agencies: The Kentucky Experience*, *Factors Influencing Local Education Agency Participation in the Programs and Services of Education Service Agencies in the State of Texas*, and *Major Policy Issues Surrounding the Education Service Agency Movement and a Proposed Research and Development Agenda*; the study conducted by the National Association of State Directors of Special Education, *State Profiles in Special Education* (Washington, D.C.: The Association, 1977); the study conducted by SRI International, *Local Implementation of P.L. 94-142: First Year Report of a Longitudinal Study* (Menlo Park, CA: SRI International, 1980); and the report by Doris Helge, "Problems in Implementing Comprehensive Education Programming in Rural Areas" (*Exceptional Children*, *47*, 7, 1981). Consultants involved by mail or telephone at this juncture included Noble Gividen, Director, Southeast Arkansas Educational Cooperative, Monticello, Arkansas, who had been a senior advisor to the Stephens series of studies cited; Thomas Schultz, NIE project officer; James Siantz, U. S. Office of Special Education; Walter Turner, American Association of School Administrators, who had conducted a study of P.L. 94-142 concerns for that organization; and Anne Wright, director of the SRI project named above.

A preliminary list of factors was drawn up based on inputs from these sources which was presented to the National Advisory Committee (NAC) at its meeting on August 20-21, 1982. The list contained factors such as ruralness (geography and demographics), degree of similarity between existing state legislation and P.L. 94-142, education service agency (ESA) structure and collaborative history, state legislation relating to ESAs, and ESA demographics. This preliminary list formed the basis for the NAC's discussion but did not lead to any final conclusions. Instead, a task was devised for the NAC to carry out subsequent to the meeting to provide further data for making the selection decision. NAC members were asked to: (1) Imagine that they were director of an ESA and had before them the stack of already completed case studies emanating from this study. On the basis of what factors would they decide which to read, that is, what would they perceive as most relevant to their interests? (2) Imagine a range of other possible consumers of these reports, e.g., LEA superintendents, psychologists, university professors. On what bases would these other audiences select reports to read? These two listings were returned to the research staff for processing.

From these inputs, that is, literature searches, consultant advice, NAC meeting discussions, and responses to the NAC post-meeting task, eight global factors were identified as most salient. These may be sorted into two groups. Group 1 deals with national or state level factors, and includes: the section of the country, the type of ESA permitted or required under state law, access to the state, and the nature of the state's funding pattern. The second group deals with site-level factors, and includes: "ruralness," ESA demographics, ESA funding pattern, and access to the LEA.

Factors of access were of course determined prior to making entre' to any particular site. These factors, at both state and local levels, were thus used simply as screens; sites (or states) which it was believed would not permit access were not considered.[1] With respect to the other factors, efforts were made to secure contrasts between sites in accordance with the purposive sampling principle of maximum variation.

No doubt the comparability of the sites could be better judged if the reader had knowledge of their identity. Although in several cases site directors would have preferred having their identity made public, because they were convinced that their sites were exemplary, nevertheless good research ethics demand that they remain anonymous.

Procedures for First Visit to Each Site

Each of the five sites was scheduled for three visits. The first, designated Site Visit 1 or SV-1, was intended to provide an orientation and overview for the site, building an initial familiarity, providing the team an opportunity to collect documents for analysis, and paving the way for Site Visit 2 (which usually followed SV-1 by about two months). During SV-2 the issues that had emerged from SV-1 data and accompanying documents were more fully explored. A draft of the case study for that site was prepared in the time interval between SV-2 and Site Visit 3, which did not occur until the second year or about eight months after SV-2. SV-3 served primarily for the purpose of member-checking the draft (see the section on trustworthiness, below, for a full explication of the member check) and for collection of whatever additional information was needed to close gaps in the data. Site visit teams typically consisted of two persons, although Site #1 was visited by all research team members in order to have a common base of experience.

In this section we shall describe the procedures relative to SV-1; these were substantially identical for all five sites. The procedures for SV-2 and SV-3 will be described in subsequent sections.

Initiating contact and gaining entre. Once a site had been tentatively identified by apply the criteria of the preceding section and determining the likelihood of accessibility from knowledgeable informants (which in all cases except Site 1 included relevant personnel from the state's department of public instruction), telephone contact with made by the Principal Investigator with the ESA Director. The nature of the study was explained and the cooperation of the Director solicited. In several cases the Director felt that he needed approval of his board and in those cases such approval was sought. In the end, all five contacted sites agreed to cooperate fully.

---

[1] It should be noted that no state or site actually contacted refused access.

When such initial entre had been gained, the ESA Director was asked to supply certain background documents which would give the research staff some initial acquaintance with the operations of the ESA. So for example, the state plan mandated under P.L. 94-142 was systematically requested, as were any other documents such as program descriptions, staff rosters, evaluation reports, public relations brochures, and the like which the Director cared to share. Analysis of these documents gave the staff some initial insights into the ESA's operation and made it possible to pinpoint the personnel with whom interview contact would likely be useful.

As soon as feasible, actual dates for the visit were arranged. The typical first site visit occupied three days, beginning with a protocol conversation with the Director and ending with a debriefing session on the afternoon of the third day to which the Director was free to invite anyone he thought appropriate.

Sampling Respondents. Prior to the actual site visit, project staff furnished to the Director a list of respondents whom they wished to interview. Key personnel such as assistant director, director of special education, master teacher, school psychologist, budget officer, and the like were scheduled by name (when they existed); in other cases, role types were named and it was left to the Director to choose the actual persons. So for example, if the ESA utilized itinerant teachers, the respondent list would contain a slot for such a person, but the Director could choose the actual respondent. In general, persons representing all classes of ESA personnel (including paraprofessionals), LEA employees who had special education duties, regular teachers and administrators who related to handicapped youngsters, LEA superintendents, members of LEA and ESA boards, and parents were included in these "open" categories. Once at the site, the research team made an effort to identify other persons who ought to be interviewed because of their special characteritics, e.g., an especially advocacy-oriented parent, a teacher who militantly opposed the idea of mainstreaming, a parent who felt aggrieved and was threatening to sue the ESA. The intent in sampling with the sites was the same as the intent at the site level, that is, to maximize the information obtained so as to develop as broad and deep an understanding of the ESA as possible.

Consent Forms. Project staff were acutely sensitive to their ethical and legal responsibility to gain fully-informed consent from respondents prior to interviewing them. Two consent forms were developed and are appended to this report as Appendices F and G. Both forms were developed by a member of the research staff who holds a law degree, and were approved by the Human Subjects Committee and the University Attorney at the University of Kansas. The first of these forms provided background information on the project, indicated that procedures to be used to safeguard materials in project files, assured the respondent that anonymity would be maintained (although reminding the respondent that no absolute guarantee of anonymity could be given because locals sufficiently familiar with the situation might be able to make judicious guesses about the source of certain kinds of information), and gave the respondent the right to withdraw at any time without prejudice (ownership of respondent data in effect remained with the respondent). Signing this form effectively gave permission to be interviewed and to have the resulting data used without attribution. The second form, about which the respondent could make an independent decision, permitted the staff to attribute remarks if it chose to do so. Blocks of consent forms were sent to the Director so that respondents could read and sign them in advance of the site visit; in instances in which advance sign-off had not occurred, respondents were asked to read and sign the form(s) at the time of the actual interview.

Logistics. Carrying out a site visit is an impossibility without a variety of logistical arrangements and supports. Travel arrangements to the sites (air schedules, car rentals, hotel accommodations) were made by project support staff through travel agents. Once on site, local travel was accomplished by a combination of University cars (for one site), personal autos (for one site), rental autos (for four sites), and transportation provided by the host ESA (one site).

Site visits always began with a protocol conference between team members, the ESA Director, and whomever else the ESA Director cared to involve. A good many activities--virtually all document collection and a goodly number of the interviews--were conducted at the headquarters of the ESA, either because the interview respondents were based there (e.g., the Director, the school psychologist, an itinerant teacher) or because it was as convenient to have the interviewee come to that facility as anywhere else (e.g., a parent, an ESA board member). But many of the interviews and some document collection were carried out in member LEA facilities--the Superintendent's office, the school building in which an EMR resource room was located, the vocational school to which selected handicapped youngsters were bussed, for example.

Despite advance planning many schedule adjustments had to be made on site. Persons scheduled for interview became ill and so were unavailable. Inclement weather slowed travel time between facilities so that time slippage occurred. Interviews were at times unproductive and were terminated early. And so on. Whenever possible, adjustments were made--persons of similar characteristics substituted, times or locations rearranged, new locations included. In other cases, the time was profitably used by the team members in reviewing documents that had been acquired or "cleaning up" field notes.

Whenever possible, team members ate lunch together to compare notes and make adjustment decisions. Often during this period a person designated as liaison to the team--typically the Director's secretary--was enlisted to rearrange the schedule and/or to contact new respondents. These liaison persons proved to be invaluable assets, and indeed, the teams could not have functioned in the field without them. It was to these people that the members also turned for routine assistance such as getting copies of documents that could not be moved, dealing with the airlines to reschedule flights, and the like.

Team members prepared a "kit" of materials to take with them into the field. Included in the kit were informational items such as local personnel rosters and maps, and, when available, basic demographic data for the ESA and its member systems. Data collection and manipulation materials--notepads for use in interviews, 3X5 cards onto which interview notes and informational items from documents could be abstracted as time to do so became available, pens and pencils, were included. Basics such as staplers (and staple pullers) and transparent tape were not overlooked. Finally, the kit contained the journals for each team member in which entries were made daily.

The importance of adequate advance logistical arrangements cannot be overemphasized, nor can the need for adaptability. Murphy's law holds no less for sites than for anything else. It is well to be prepared.

Interviewing.[1] Interviewing was the basic mode of data collection for the research. During SV-1 team members' skills as interviewers were tested as at no other time, for this site visit was orientational and hence the interviewing was most unstructured and open-ended. The utility of the human-as-instrument could not have been more clearly demonstrated.

While it is an oversimplication, interviews may be viewed as basically of two kinds: those in which the interviewer knows what it is he or she doesn't know and so can form specific questions to find it out; and those in which the interviewer does not know what he or she doesn't know, and hence cannot be specific in the questioning process. In the latter case it is important to uncover informants who not only have the answers to questions but also know what questions are important to ask. The interviewer must take the posture of learner; he or she says, in effect, "Tell me what questions I ought to ask, and then answer them for me." It was the latter situation that the team members found themselves in during Site Visit 1; during later site visits, it should be noted, the former situation was more closely approximated, and questions could become much more specific.

Accordingly, the protocol for SV-1 interviews was very open-ended. During this site visit it was more important to identify useful informants than to know specifically what to ask them. The interview proceeded through a number of phases, somewhat as follows:

1. Introduction and warmup. During this phase the interviewer would remind the respondent of the purpose of the study, and, if consent forms had not already been read and signed, would walk the respondent through this step. Then, both to get the respondent accustomed to speaking freely, as well as to "warm up" his or her mind with respect to the substance to be discussed, some personal "grand tour" questions were asked. Examples are, "How did you come to be a ____________?" Or, "What's a typical day like for you around here?"

---

[1] See Appendix B for a table of interviewees.

2. Delineation of roles and responsibilities. Since it was important to understand the particular perspective of the informant, the next series of questions dealt with a description of the informant's role in the organization and the responsibilities he or she bore. It was also important to acquire some sense of the informant's career aspirations. Typical questions were: "Just what do you do here?" "What's the nature of your job?" "What are you responsible for?" "Where are you going from here?"

3. Delineation of relationships. At this point it usually became possible to delve into the respondent's relationships with other persons in and out of the ESA. A description of such relationships begins to give a sense of how the organization operates, what it channels of communication are, and how accountability works. Example questions are: "Who do you answer to?" "For whom are you responsible?" "What expectations are held for you, and by whom?" "How do you communicate with these others?" "How are disputes or conflicts settled?"

4. Delineation of issues. By this time in the interview the informant was typically quite involved and ready to deal with more substantive issues. (Respondents not involved at this point were further stimulated with additional general questions as above, or, in a very few cases, the interview was terminated.) The point of this phase of the interview was to have the respondent identify as many issues (however he or she personally felt about them) as possible. Some sample questions: "What do you think are the big problems that keep the (ESA) from doing as well as it might?" "What are some of the things that get in your way personally?" "What are some of the factors that make it hard for you to do your job?" "Easy for you to do your job?"

5. Dealing with issues. When the respondent had volunteered as many issues as he or she could think of, the interviewer moved on to explore each issue in detail. If, for example, the respondent had mentioned a lack of adequate diagnostic services, the interviewer might say, "Among the things you mentioned as troublesome is the lack of adequate diagnostic services. How do you get around that problem? What do you do about it? What ought to be done about it?"

Certain issues had previously been identified by the research team from prior studies,[1] or, in the case of later site visits, from the earlier ones. When all the interviewee-identified issues had been explored, the interviewer, to whatever extent time permitted, introduced those a priori issues (assuming they were not already included among those volunteered by the respondent) and sought an opinion. Questions relating to weather, travel time and distance, socialization of ESA staff into the normal routines of the LEAs served, and the like were included. After a few interviews had been conducted, issues identified by earlier respondents but not raised by the respondent being interviewed were also introduced for comment and reaction. In this way the interviews became more focussed over time, and the insights of one respondent could be checked by others. Confidence in the data could thus be built up as the site visit progressed.

---

[1] This use of issues from the literature is one example of the ways in which the research synthesis materials developed by the staff were used symbiotically with the field studies.

Most interviews were scheduled for a one hour period. Some interviews were terminated in less than that time because they proved to be unproductive. In some instances, interviews were scheduled for only 30 or 45 minutes to fit the requirements of the respondent. Interviews with more "elite"[1] respondents, for example, the ESA Director, were often scheduled more open-endedly, since the interviewer needed to have whatever time was necessary to pursue all issues that emerged. In several instances interviews proved to be so productive that the interviewer elected to go on with them (to whatever extent the respondent permitted) until the information forthcoming had been exhausted, even if subsequent interviews had to be rescheduled as a result.

At the end of each interview, the interviewer attempted to summarize and "feed back" to the respondent the main points that had been made. This summary served multiple purposes: as an initial "member check" (see below) on what had been said, as a stimulus to the respondent to recall other items of useful information, and as a means of "getting the respondent on record" about what had been said.

The staff early on made the decision not to tape-record interviews. While there are many advantages to such recording, for example, an unimpeachable data source, completeness, opportunity to review as often as needed to be certain that all essential information had been abstracted, opportunity for subsequent review for non-verbal clues such as significant pauses, raised voice, and the like, it was felt that these advantages were more than offset by the disadvantage of respondent distrust. While the teams were to be on site on three occasions over a one-year period, and so could expect to build up some relationships of trust, a total of nine days is hardly sufficient to support the claim of sufficient engagement and persistent observation needed to develop these relationships to an optimum level. It was more important, it was felt, to keep the interviews informal and relaxed, even at the expense of some information, than to record everything under circumstances that would reinforce the respondent in an attitude of suspicion and anxiety.

Accordingly, the interviewers relied entirely upon what hand written notes they could take during the interview itself. Obviously not every item could be recorded, and hence the possiblity of some selective bias exists. However, the interviewers attempted to record all key ideas, even if only in shorthand form. These notes could be fleshed out following the interview so that they could be readily understood later. The taking of hand written notes, it should be appreciated, offers some advantages that the tape recording does not, as for example: making it possible to record questions, insights, or comments not directly stated by the respondent but which were stimulated in the interviewer's mind by the interaction; to record non-verbal cues that the interviewer happened to note, especially those that were at variance with what was being publicly stated; to refer back to information given earlier for clarification or redirection, as called for by the flow of the interview; and to facilitate summarizing for the terminal member-check. The decision to use hand written notes rather than tape recordings is thus by no means a one-sided trade-off.

---

[1] The term "elite" is used in the sense of Dexter (Elite and Specialized Interviewing. Evanston, Il: Northwestern University Press, 1970) to denote respondents with specialized knowledge.

Document collection. As has already been noted, numbers of key documents were collected by mail prior to SV-1; these were typically perused sufficiently well in advance of the visit to "furnish the site visitors' minds" about the setting they were about to study. But in addition, many other documents were collected on site. Typically, the Director of the ESA would have available other relevant materials that he could not send by mail but which he was amendable to having copied and being carried off. Other documents would be mentioned by interview respondents as important sources, and in such cases, they were asked for copies. In some cases these documents could remain in the possession of the staff; in other cases the staff was authorized to copy them at their University offices and return them by mail. Some documents could be consulted, and notes made about their contents, but the reports themselves could be neither removed nor copied. In general, the staff attempted to err on the side of commission rather than omission; it was better to collect materials which subsequently turned out to be irrelevant or unimportant than to make ill-informed decisions on site about importance that later were regretted. As a result, the staff sometimes felt like "pack-rats," carrying away anything and everything which they could in good conscience remove.

Journal entries. In accordance with certain suggestions by Lincoln (1981), the staff resolved to develop "reflexive journals" with entries of five types made in five different (and separate) sections of the journal:

1. A log of developing perceptions. This log began with a statement prepared by each site visitor prior to visiting the site for the first time in which the staff member recorded his or her expectations about what would be found at that site. This statement was intended as a partial check on the observer's own biases; if, after visiting the site, he or she produced a report that contained only (or little more than) corroborations of those expectations, one would be justified in presuming that he or she was not very open to actual site data. The staff members were expected to add entries about their changing insights and affect over time, as their familiarity with the site grew; the log would, presumably, provide a record of the site visitor's growth in the setting. In practice, this journal turned out not to be very useful, mostly because the actual contact with a particular site was sporadic rather than sustained, and because staff members could not sort out impressions, insights, and affects gained from one site from those gained at another site. While such a journal might in principle be useful for sites at which an observer remained for sustained periods, it was found not to be particularly useful in this case.

2. A log of day-to-day procedures. This log was entered on a daily basis by each site visitor to record the day's activities, more or less in diary form. It provided both a legal trail of contacts made (should that ever become an issue) as well as a portion of the audit trail that might be examined by a post-study auditor (see below for a description for the audit function).

3. A methodological log. In this log were recorded all methodological decisions and decision points which influenced the final design of the study. Since the design was emergent, decisions would be made from time to time that would redirect or refocus the study. In order to keep track of these decisions, both for the guidance of the staff and the use of a subsequent auditor, this journal was kept by the Principal Investigator; at the time of writing of this technical report (which also depends heavily on it), it occupied some three loose-leaf binders of materials. Some sense of the scope of entries can be had by noting just two extreme examples: a record of a telephone call with an informant that added several possible factors to be considered in the site sampling plan, and a copy of the Revised Research Plan submitted to NIE which formulated the staff's design ideas some six months into the project.

4. A log of day-to-day introspections. This log was intended to represent some dimensions of the persons-as-instruments who were actually engaged in doing the research. If it is important to know about the nature and properties of paper-and-pencil or brass instrumentation in conventional research, so is it important to know about the properties of human instruments in naturalistic research. In this log, staff members recorded, in diary form, their own thoughts and feelings about the research, the site, the people, or any other factor that appeared to be influencing them. The intent was to parallel (roughly) the kind of introspective reflection found in such self-reports as Wax (1971) or Reinharz (1978). This log, like the log of developing perceptions (# 1 above) turned out not to be useful for roughly the same reasons.

5. A log of developing insights and hypotheses. It was expected that in this log each site visitor would record the hypotheses that began to emerge in his or her mind while actually carrying out the mechanics of a site visit or during related data analysis activities. It was presumed that these hypotheses could be pursued in subsequent activities of the same site visit or in subsequent visits. This technique, while reported to be quite useful to lone field researchers (Douglas, 1976; Reinharz, 1978; Wax, 1971), did not prove to be so in the present case precisely (as it turned out) because of the frequent opportunities for staff to exchange ideas face-to-face (see below). These team interactions effectively precluded the need for this type of journal.

Other activities. While on site the research team made every effort to remain open to the setting and its features by engaging in a variety of other activities, often serendipitously, that happened to present themselves. Some of these were relatively formal, as for example, attendance at a meeting of the ESA board which might take place during the site visit, or looking on at a teacher training session. But more informal activities were also in included, such as engaging clerical personnel in conversation, eating in local restaurants and chatting with waitresses and fellow diners, studying bulletin board displays or decorative features of offices, or taking notice of physical characteristics: the nature of the land, the kinds of crops standing in the fields, the architecture of the towns, and the like. All of these activities, while not yielding "data" in the usual sense of the word, helping the team to sense the ambience of the setting and to develop its store of tacit knowledge about it. The reader may judge from a reading of the case studies whether this store of tacit knowledge played a major--and important--role in the way that the cases were developed.

On-site team interactions. As much of the site visit work occurred in formal and informal interactions between site visit team members as between team members and local respondents. This close interaction is a virtual requirement of a paradigm that relies on an emergent design, since each step of the process is dependent on the preceding steps. When more than one researcher is involved, it is essential that they communicate frequently in order that the design should unfold in similar ways for all of them.

Team members made every effort to eat all three meals together as well as to meet more formally each evening to review the day's work. The breakfast meeting was typically devoted to recalling agreements about how to carry on that day and easing the inevitable tensions for one another that arise at the prospect of spending the next eight to nine hours in intense contact with informants. The lunch period was devoted to a quick exchange of information about the morning's work in the event that something might have occurred that would lead to alterations in the afternoon's schedule. The evening meal was devoted to relaxation and mutual catharsis. It is impossible to overstress the need for such an experience at the end of a hectic day of interviewing persons all of whom, whether hostile or friendly, demand one's close attention.

The real work of interaction took place in the evening. Usually the team members would spend a few moments making entries in their logs; this work would recall the day's activities and prime their minds for the discussion to follow. A variety of matters might be considered. Both team members would typically have developed some new hypotheses or insights about the situation which had to be traded, discussed, and either scheduled for further attention or discarded. One or the other of the team might have uncovered new, important or curious information, which needed to be further checked (triangulated; see below). Certain documents might have come to attention which needed to be traced and copied. Certain equipment or installations, e.g., a computer facility being developed for the purpose of preparing IEP "boilerplate," or a media facility or a vocational educational laboratory with unusual features, might have been discovered which should be examined. And so on. Such emergent features were built into the schedule for the next day--a step which might require having the local liaison person get on the telephone early next morning to rearrange schedules.

These interactions were especially crucial during SV-1, because it was during this visit that the team became oriented to "what it did not know" and focussed its efforts in those directions. In subsequent site visits the information to be collected was much more clearly pinpointed, and far fewer adjustments were needed. Without this close interaction between team members much of the value of SV-1 would not have been realized. Fortunately the contingency had been foreseen, so that scheduling arrangements allowed both for this team interaction and for the adjustments which would inevitably need to be made subsequently. Naive site visitors are likely to overlook the importance of such arrangements, or assume that all needed interactions can be easily disposed of in a few minutes stolen here or there. Such a misjudgment can be devastating to the work of the team.

Debriefing. Each site visit was terminated with a so-called debriefing session arranged with the ESA Director, who was privileged to manage the session in whatever way he construed as most productive. For example, he chose who would be in attendance, the time to be devoted to it, and, to some extent, the substance to be covered. The ostensible purpose for this debriefing was as a courtesy to local respondents who had given of their time and energy and so deserved an opportunity to "ask some questions back." It was, to all intents and purposes, a matter of protocol.

But of course both sides (as it turned out) had additional agendas that were pursued during these sessions. From the point of view of the site visit team, the debriefing session also served these functions: as an opportunity for member-checking certain key hypotheses and insights that had been developed (see below); as a source of new or additional information (as the participants were stimulated by the discussion to further recall, or to challenge or counter the information provided); and as a mechanism for anxiety reduction (locals almost always interpreted the site visit as an evaluation despite the assurance of team members to the contrary; evaluations inevitably breed anxiety) that would pave the way for a more productive and cooperative Site Visit 2.

For local respondents, the debriefing session served additional functions as well: to solicit from the team some initial feedback about what they had seen ("its useful to us to see ourselves through the eyes of outsiders") and what they thought most deserving of comment, whether positive or negative (evaluations were solicited even if not intended); and the opportunity to provide clarifications to the team lest they depart with a "wrong impression" or an "incomplete picture."

The actual content of the debriefing sessions varied from site to site. When only the ESA Director was present, the discussion was more informal; when more than one person was present, the meeting had fewer of the characteristics of a conversation and more of those of a formal report. In all cases the debriefing began with a short presentation from team members that covered the "highlights" of what they had seen; thereafter the discussion moved in whatever directions the participants desired. When the director was the sole participant, he set the agenda entirely in terms of his own interests, but when multiple respondents were involved, they often became engaged in voicing different opinions so that the site team members found themselves in the role of moderators rather than "targets."

There can be no doubt that these debriefing sessions were useful on both sides, serving multiple purposes simultaneously while also fulfilling protocol requirements. Respondents and site team members emerged from these meetings less as protagonists than as colleagues in a common research effort which both had helped to shape. While it would be inappropriate to claim that this research project is an instance of participative research (sometimes also called dialogic or endogenous research; see Reason and Rowan, 1981), it is clear that the debriefing gave local participants that opportunity to gain a better perspective on research aims and to make a significant contribution toward shaping the inquiry effort.

Analyzing Site Visit 1 Data

Interview and observational[1] data collected from site visits were analyzed in essentially three steps: unitizing, individual categorizing, and team categorizing. The results of this analysis were used in two ways: as items to be considered in the writing of the case study, and as sources for further questions to be pursued during Site Visit 2.

Unitizing. The essential purpose of the unitizing step is to identify and record essential units of information. The definition of unit is relatively straightforward: a unit is a single piece of information able to stand by itself, i.e., interpretable in the absence of any additional information. Such a unit may be a simple sentence (e.g., "Respondent indicates she spends about 10 hours a week traveling from school to school,") or as much as a paragraph (e.g., "Respondent believes that there are essentially three reasons why itinerant teachers are not accepted as a 'member of the family' in the schools in which they serve: (1) because they are excused from the normal routines that characterized teachers' lives, such as lunchroom or playground duty or club sponsor; (2) because they are seen as 'experts' whose utilization by a regular teacher implies an inability of that regular teacher to solve his own problems (a kind of incompetence); and (3) because they carry a kind of stigma which attaches itself to the students whom they serve.") In either case, the material in the unit is completely self-explanatory, but if a portion of the unit were to be removed, the remainder would be rendered uninterpretable, seriously compromised, or significantly altered.

The process of unitizing was carried out by each team member independently. The data source (field note or interview note), was carefully read, a sentence at a time. The researcher would then ask himself or herself whether the information contained in that sentence was in any sense relevant to the broad mission of the research; if it was deemed to be, it was entered (in sufficiently full language so that another person would be able to understand it) on a 3X5 card. The general rule followed was to include everything that the researcher believed to be in any way relevant; it is easy to reject irrelevant material later but impossible to recapture relevant material that is not recorded. Each card was coded in several ways:

---

[1] Documents were used primarily as background and support materials; their analysis was accomplished chiefly through an indexing process (see "Drafting the Case Study," below).

- * a designation for the interview number from which the item was drawn, plus a page or paragraph designation, so that the context of the item could be readily determined, should that become important;
- * a designation for the type of respondent, for example, teacher, school psychologist;
- * a designation for the site (1 - 5); and
- * a designation for the number of the site visit (1, 2, or 3).

The typical yield from the field/interview notes of an individual team member was between 200 and 300 unit cards.

Individual categorizing. The essential purpose of the categorizing process is to bring those cards relating to the same content together into a loose taxonomy. The process is essentially an analytic-inductive one, but it is rule-guided, although the rules emerge as part of the categorization process. Of course, it is possible to devise multiple category systems that will equally well account for the unitized cards; the purpose of this step is not to discover the set of categories that definitely encompasses the units but a set that handles the unit cards reasonably well. What is meant by "reasonably well" is, essentially, that an auditor would subsequently agree to the reasonableness of the category system (see below).

The process that was used is virtually identical to the "method of constant comparisons" described by Glaser and Strauss (1968), although the purpose is somewhat different. They describe a method for "discovering grounded theory," that is, a theory that will adequately account for the data that have been collected. The complete method of constant comparisons therefore includes some steps leading to the specification of a theory; these steps were not utilized here because theory development was not a purpose of the present study. However, the first steps of the present research could not be distinguished operationally from those proposed by Glaser and Strauss. Most particularly, it should be noted, the steps that were taken are not subject to criticisms of writers like Ford (1975) and Hesse (1980), who object to grounded theory because of the well-known hazards of induction and the essential underdetermination of theory inductively derived (there are always multiple theories that equally well "fit the facts"; there is a serious question whether facts are not themselves already "theory-laden" so that the process described by Glaser and Strauss may be tautological).

Essentially, the steps are somewhat as follows:

1. Select the first card from the pile of unit cards (which are presumably piled in more or less haphazard fashion). Read the card and note its content. This first card represents the first entry in the first, and yet to be named, category.

2. Select the second card and read its content. Make a determination whether the second card "looks like" the first, that is, has content essentially similar. If so, place the second card on the first and proceed. If not, the second card represents the first entry in the second, and yet unnamed, category.

3. Continue on with successive cards. For each card decide whether it is a "look alike" with cards already placed into a common category or whether it represents a new category. Proceed accordingly.

As the process continues in this fashion, new categories will emerge rapidly at first, but the rate of discovery will begin to diminish sharply after 50-60 cards have been processed. At this point also, certain of the categories of "look-alikes" will have a substantial number of cards in them, say, eight to ten. With these categories proceed as follows:

4. Take up cards that have been placed in a "look-alike" category. Attempt to formulate a rule that would help in determining whether a new card belongs in this category or not. To put it another way, during this step attempt to translate the tacit knowledge that has led the sorter to judge the cards as "look-alikes" into the propositional language of a rule for classification.

5. Continue with Step 3 above, and with Step 4 as new categories begin to approach critical size, until cards have been exhausted. It will probably be the case that early efforts to formulate rules will prove to be inadequate, and new rules will be developed as experience with each provisional category accumulates.

6. When a provisional category system has evolved, re-read all cards to be certain that they now fit into the categories in which they were provisionally placed. During this reading, however, the placement decision should be entirely determined by the rule and not by the cards' look-alike quality. The researcher must be able to assert, at the end, that each card in the deck was passed through the same judgmental net and was assigned by rule, and not merely appearance.

7. Provisionally name each category.

8. Review the entire category system that has emerged. Examine the categories carefully for relationships; it is possible that certain categories might be subsumable under others; that some categories are unwieldy and should be subdivided further; and that some categories are missing, a fact that is made evident by the logic of the category system as a whole. (For example, if the category system has a subset of cards dealing with due process involvement in IEP development, it would be immediately evident if some class of persons who ought to be involved, parents, say, were never mentioned by respondents.) Also examine the categories for completeness; it is probably

the case that the scope of information for some categories is much more complete than for others. Missing, incomplete, or otherwise unsatisfactory categories may be immediately earmarked for follow-up during Site Visit 2.

The number of categories that emerged for a given site was typically on the order of 40 to 50; the following examples are indicative of the kinds of categories that might have been found at some particular site:

° Space/Facilities
    reasons why LEAs are reluctant to provide space.
    multiple SPED teachers using one room.
    an example of a space problem with the ED program.

° Transportation
    scheduling and distance
    other problems

° Staff retention/recruitment
    ESA strategies for hiring
    hiring problems
    why staff leave
    burnout

° The ED program
    retention and recruitment of teachers (cross-reference with previous category)
    the ED population
    evaluation of the ED program
    need for ED proggram
    transportation of ED pupils (cross-reference with transportation above)
    parental inputs and reactions

° Unanticipated consequences
    stigma
    general slowdown to accommodate mainstreamed youngsters
    misclassification of children
    salary differential for teachers

° ESA board operation
    roles and responsibilities of board members and superintendents
    board meeting procedures
    perceptions by board members of the ESA
    attitudes of board members toward the ESA and special education

The above list is of course very incomplete but it provides a flavor of the kinds of categories that emerged from the SV-1 data.

Team categorizing. The categorizing steps outlined in the preceeding paragraphs were carried out by each team member individually. Following their completion of this task, a team meeting was called for the purpose of combining the individual categories into a mutually agreed upon master set. At these meetings, the lead researcher for the site would select one of his categories, indicate its title, and stipulate the rule by which he had classified the included items. The other researcher(s) would look over their own categories, and if they had developed one like that announced (as was very frequently the case), the cards would be combined and the rule adjusted to suit the separate formulations. (Sometimes as a result of this adjustment a few of the cards from one or another individual sort had to be removed or reassigned.) The process was continued until all categories had been accounted for. This master set was then accepted as the base for subsequent steps, most particularly, Site Visit _2_. Additional information needed to flesh out a category (or to explore a missing category suggested by the logic of the set) was noted and built into the interview guides for Site Visit _2_.

Procedures for Second Visit to Each Site

Site Visit _1_ was intended to provide an orientation and overview to the site, and to lead to the development of a series of questions that would be pursued during Site Visit 2. In this section we describe the procedures customarily used during that second visit (_SV-2_).

The data for Site Visit _1_ were processed in the manner explicated in the preceding section. From that step a number of products emerged that were basic to _SV-2_:

1. A list of issues to be more fully explored.

2. Missing and incomplete categories of information as high-lighted by the categories that had evolved.

3. Identified conflicts or inconsistencies in the data that needed to be resolved.

In addition, a complete openness to new information was maintained. It could by no means be assumed that all of the basic matters of relevance had been detected during _SV-1_, so that all that would be required during _SV-2_ was patching up around the edges. The research team had no delusions about the comparative simplicity of _SV-2_ as compared to _SV-1_; they were prepared to uncover at least as much _new_ information on the second visit as on the first. It is a tenet of the naturalistic paradigm that inquiry can be expted to diverge rather than converge; good inquiry always raises more questions than it answers. The longer inquiry proceeds, the more questions that are unearthed.

Nevertheless, planning for _SV-2_ began with the residual questions stemming from _SV-1_. When those questions had been identified, it became possible to name the individuals (or classes of individuals) who would be in a position to answer them. Thus, while the intent of respondent sampling in _SV-1_ had been to generate as broad a sample as possible to allow for maximum variation, respondent sampling in _SV-2_ was intended to generate a sample that could be expected to be maximally knowledgeable about the matters to which the team elected to direct its attention.

The details of SV-2 arrangements were handled in ways virtually identical to SV-1. Entre had already been assured, and it was possible to negotiate directly with the Director of the ESA to identify the sample and make all requisite field arrangements. Consent forms were provided for those respondents who had not participated in SV-1; for the latter, the earlier consent forms covered the necessary contingencies.

The major difference between SV-2 and SV-1 was in the form of the interview protocols. Whereas the latter had been very open-ended, those for SV-2 were much more structured. Separate protocols were devised for specific informants; thus, one form was devised for the Director, one for the school psychologist, one for itinerant teachers, and so on, as the local situation dictated. For example, the following protocol was generated for regular teachers at Site #1 who had special education youngsters mainstreamed in their classes:

Paperwork

1. Who bears the responsibility for the goals and objectives listed on the IEP?
2. Are IEPs used in any way to judge your performance? Even informally?
3. How much time do you spend on paperwork related to the IEP?
4. How is the IEP (once written) used for instruction? What is its main purpose? How often do you refer to it?
5. Do SPED teachers'/ESA's suggestions regarding IEP format/ contents carry much weight? Would directives from the SEA carry more weight?

Transportation

1. How does the fact that itinerants have to travel affect the services you get from them?

Recruitment/Retention

1. How are teachers who live outside the county viewed?

In addition to such specific information, respondents in SV-2 were given the opportunity to provide other information. For example, if new developments had taken place since SV-1, the team was anxious to know about them. Any additional information which had occurred to respondents previously interviewed about anything that they had said was solicited. New respondents were treated very much like SV-1 respondents had been in that they were asked open-ended questions and given an opportunity to free-associate to the issues they sensed. And of course, new documents coming to the attention of the research team were collected before. Team interactions were scheduled as during SV-1 to continuously redirect the SV-2 efforts.

SV-2 ended, as had SV-1, with a debriefing session. In general, whatever steps had been taken during SV-1 at a particular site were duplicated at SV-2; for example, if the debriefing during SV-1 had taken place with the Director only, that same process tended to be repeated in SV-2. Roughly the same purposes were served and the same benefits benefits emerged during this debriefing as in the earlier one.

Analyzing Site Visit 2 Data

The SV-2 data were unitized and categorized using the same procedures that had been followed in SV-1. Now, however, the categories that had emerged from the SV-1 data, and that had been mutually agreed upon that had emerged from the SV-1 data, and that had been mutually agreed upon by the research team, were available to guide the individual categorization process. Of course, the SV-2 data sometimes required the establishment of new categories, or adjustments in the old. Individual team members made note of these indicated changes; they were then discussed during the team categorization step and adjustments were made by mutual agreement.

Drafting the Case Study

SV-1 and SV-2 provided the basic information from which the case studies were drafted. The case study was developed between SV-2 and the third site visit; it was the major purpose of SV-3 to obtain respondent's reactions (member-check; see below) to the draft prior to a final revision. Each case was developed by a single author who had been a site visitor for both SV-1 and SV-2.

Writing the five case studies turned out to be the major task of the project; it required more man-hours overall for case development than had been invested in field work and subsequent data analysis activities combined.

Indexing the materials. The first step in writing any case study was to organize the materials on which it would be based: the unitized and categorized data cards, and the variety of relevant documents which had been collected. To accomplish this organization implied the development of detailed indexes of cards and documents. The former was a relatively easy task, since the card categories were all named and numbered; so for example, the first few categories of cards for Site #1 were as follows:

1. Perceptions of the ESA.

   1.1 Satisfaction with the quality of services.
   1.2 Equivocal satisfaction.
   1.3 Concerns about services.

2. Retention/recruitment.

   2.1 General issues.
   2.2 Personal strategies for coping.
   2.3 ESA strategies.

    2.4 Hiring problems.
    2.5 Why staff leave.
    2.6 Burnout.

3. Perceptions of the school psychologist.

    3.1 Roles/responsibilities.
    3.2 Positive strategies.
    3.3 Comparisons with former psychologists.
    3.4 Weaknesses.

The set of card categories numbered 58 for this site; each was subdivided into relevant categories as exemplified above.

The indexing task for documents was much more complex. The number of documents available for a site was usually quite large, and decisions had to be made about each one's relevance for the task in order to keep everything within manageable bounds. When those selections had been made, each retained document was indexed completely if it was systematically relevant or partially if not. For example, for Site #1, eight items (or collections) were indexed to a greater or lesser degree, including:

- the state education directory.
- the state statistical abstract.
- the state P.L. 94-142 annual plan (two years).
- the operational manual issued by the ESA.
- a bound volume of newsletters issued by the ESA.
- a collection of documents that had been compiled prior to the site visits into a single "informational folder."
- a collection of special items gather by individual team members on site and bound into a folder.
- selected documents (brochures, proposals, forms, reports, etc.) that had been compiled into an "odds and ends" folder.

The first of these documents, the state education directory, was indexed for only two items of information relating to the network of ESAs in the state; the operational manual was indexed for 24 items, each with multiple subparts. Others were indexed at intermediate levels.

Generating an overall outline. The second step in writing the case study involved generating an overall outline as detailed as it could be made at the outset. The outline was itself organized into three major parts: description, problems/issues, and "lessons to be learned." The intent was, first, to give the reader a "feel" for what the site was like; second, to introduce him or her to the problems and issues as seen through the eyes of the local participants; and third, to tease out lessons that might be learned from the local experience.

So for example, the overall outline (omitting sub-categories) for the Site #1 case study as originally projected included:

A. Introduction.

B. Demography.

C. Goals/objectives/needs.

D. Organization/Governance.

E. Targets (ideal; planned).

F. Pupils served (actual).

G. Functions/Operations.

   1. Client processing.
   2. Instructional programs.
   3. Non-instructional projects.
   4. Support services.
   5. In-service training.
   6. Development.
   7. Monitoring/evaluation.
   8. Due process/parental involvement.
   9. Public relations/communications.
   10. Managing political factors.

H. Facilities.

I. Staff.

   1. Certificated.
   2. Paraprofessional.

J. Funding.

K. Logistics/scheduling.

L. Relationships.

M. Constructions (of the ESA by various stakeholding groups).

N. Making changes.

The above categories were deemed necessary to provide the "thick description" which naturalistic inquirers believe to be essential in describing a local context. There followed:

O. Major problems/issues and solutions (if any).

   1. Local autonomy.
   2. Staffing recruitment and retention.
   3. Interpretation of/compliance with P.L. 94-142.

4. Transportation.
5. Contextual constraints.
6. Space/facilities.
7. Paperwork.
8. Resources.
9. Minorities.
10. Referral judgments.
11. Inefficient logistics.
12. Itinerants.
13. Artificial division of EMRs into self-contained rooms and LDs into resource rooms.
14. Staffing (handicapped).
15. The IEP.
16. Stigma.
17. Slowdown to accommodate the mainstreamed.

P. Lessons to be learned (this section was not detailed further in the initial outline pending writing of earlier portions; in effect, this section, like the design in general, was expected to "emerge").

This provisional outline was submitted to the entire research team for comment and suggestions. In this case minimal changes were proposed; in other cases the changes were more dramatic.

Cross-referencing materials to outline. The third step, following provisional agreement on the outline, was to cross-index the data cards and documents to the several proposed sections. This was accomplished by reviewing each outline item against each item of the indexes, and noting on the former the location of pertinent materials. So for example, the portion of the outline dealing with organization/governance (D above) was indexed as follows:

1. Overall organization. B4.1, M9, C39.3.

2. Description of the members--number, type, special characteristics. B4.6, SED 1 & 2, SA 1.

3. Governance (particularly the nature of the Board). B4.3 & 4.4, M2 & 3; C38, C39.6, C51.

4. Decision processes. C39.4, C39.5.

5. Legal status. M4.

6. State, SEA context information. OE5, Sp.

7. Advantages and disadvantages of membership for LEAs. C8.

8. Functions other than SPED performed by the ESA. SED2.

9. Nature of the contractual agreement. M5 & 11, NL3, OE 4d & 7, C39.1, C39.2.

10. Communication. C39.4.

The designation "C" always referred to one of the card categories; thus, C39.3 indicates category 39.3 among the cards. The other designators indicate various documents, as for example, "B" indicated the informational folder, "M" the operational manual, "SED" the state education directory, "SA" the state statistical abstract, "OE" the odds and ends folder, "SP" the state P.L. 94-142 plan, and "NL" the newsletter volume.

Conventions governing the writing. When these various indexing and cross-referencing tasks had been completed, it was possible to begin the actual writing. In carrying out this task several conventions were followed:

1. The writing was to be, so far as could be managed, informal. The task of the writer was to portray the ESA from the perceptive of the local participants, "seeing the world through their eyes," as it were. The writing should be sufficiently detailed so that if a reader were suddenly to be transported to the site, he or she would experience a feeling of "deja vu," of having been there before and being intimately experienced with it.

2. Confidentiality and anonymity were to be scrupulously honored. This task turned out to be so troublesome that serious questions were raised whether it was possible or even desirable to maintain this standard. It can be argued, after all, that persons engaged in publicly supported activities involving children ought to be willing to stand up to public scrutiny. So for example, Robert Stake, in his case study (1982) of the AIR-conducted evaluation of the Federally-supported Cities-in-Schools Project, suggests in a footnote:

> Most of my colleagues would anonymize as many people, programs, and places as they could. Exposure regularly leads to undervaluing. To an important extent, personalistic detail such as I have provided is demeaning. I regret that. My model is not the journalistic expose. Nevertheless, I have rejected anonymization because it limits reader opportunity to combine new information with that already held. And here, where millions in public money were spent for a small program, and three-quarters of a million more for the evaluation, arguments for privacy seem unpersuasive.

But of course the present study was not an evaluation; moreover, the research staff had an obligation to anonymization because of the commitments that had been made in the consent forms. But applying the principle soon produced two problems:

a. The problem of internal anonymity. Two considerations militated against preservation of anonymity with local participants. First, the locals possessed too much tacit knowledge of the situation and of one another to render observations anonymous. They would easily be able to detect which agency, or which person, was being referred to, even if the names were changed. Second, locals were to be called upon during Site Visit *3* for member-check purposes; they would be asked if the document was credible in their eyes. *Too much* alteration in names or circumstances would render their judgments moot. It was essential that an appropriate balance be struck. Accordingly, it was decided that in the early drafts that would be used during *SV-3*, the names of individuals would *not* be used and the names of towns would sometimes be changed, but the names of program elements would not. After the *SV-3* member check, further changes would be made in all elements that had not been previously altered. It should be recognized that the deletion of names would nevertheless not protect one-of-a-kind role incumbents, e.g., the ESA Director or the school psychologist (if there were only one).

b. *The problem of external anonymity*. A second issue had to do with the maintenance of anonymity for the site with persons not intimately acquainted with it. Clearly it was not important for general readers to know that a particular site was in a particular state, although it might be important to know the characteristics of that state. The general rule evolved that no item of information should be included in a case study that was not essential for understanding the operation of the ESA being studied. Moreover, all references--state names, map configurations, physical features, were to be altered or disguised so that it would be very difficult (but of course not impossible for a determined sleuth) to discover the actual location of the site.

An interesting problem related to the preservation of external anonymity surfaced when it was discovered that several of the ESA directors were anxious to have their programs *publicized*. They were convinced that they were operating exemplary programs and would have been pleased to have their accomplishments openly recognized. However, since anonymity was guaranteed in the original agreements with sites, and not all sites wished to "go public," the principle of anonymity was maintained with the practical constraints outlined in the last few paragraphs.

3. The writing was to be neither evaluative nor interpretative except in those sections explicitly intended for such purposes, that is, the sections dealing with problems or issues and with "lessons to be learned." That guideline did not preclude noting evaluations or interpretations made by respondents, but these are data, not team reflections. Nevertheless, in a new instances it was felt that evaluative or interpretative statements by the case study writer should be inserted in order to provide balance. In such cases, the convention was adopted of *underlining* the statements to make it clear to the reader that he was being exposed to the team's thinking and not that of respondents.

4. A complete "audit trail" was to be inserted into the case so that an auditor might subsequently be able to trace any statements back to the original data on which they were based. The function of the auditor will be explained in a subsequent section on trustworthiness; suffice it here to say, however, that that function cannot be discharged in the absence of an "audit trail," a concept not dissimilar to the audit trail in fiscal accounting. Accordingly, draft (but not published) versions of the case were documented in the right hand margins of the pages with consecutive numbers which led the auditor to appropriate supporting notes. So for example, the number that appears in the right 206

margin of this paragraph would lead an auditor to note number 206, in which he would find the base references necessary to support the statements of the paragraph, e.g., C22.5, M6, OE4.2. Thus, the auditor presumably would find supporting material in card category 22.5, operational manual item 6, and "Odds and Ends" folder item 4.2.

5. The case would officially end at the termination of Site Visit # 2. Considerable time periods (on the order of eight months) typically intervened between SV-2 and SV-3; there usually were many developments during this period that would have the effect of altering statements made in the case. The team determined, however, that it could not continuously update the case, not was such updating necessary for the purposes of the research. Yet it was felt that readers might be interested in the outcomes of some situations that were necessarily left hanging in the case report itself. Rather than rewriting the case, it was decided to append an epilog in which such later information (usually collected during SV-3) could be included. The reader would gain some satisfaction but the research team would not be faced with the onerous task of continuous revisions. Of course, the reader would necessarily have to draw out the implications of the developments on his or her own.

Integrating themes drawn from the research synthesis. Since a parallel project task involved articulating the data of the case studies with the major themes abstracted from the research literature (and reported in Volume 3 of this series), it was important that the case study writers were as informed as possible about what those themes were--at least insofar as the synthesis work had uncovered them by the time the case was written. Without such knowledge the case study writer, in making selections about what to include and exclude from the case, might inadvertently make a series of choices that would render later comparisons moot. Attempts were made therefore to provide provisional versions of the research synthesis to the case study workers in a timely fashion. So for example, prior to the development of Case Study 1, the case study writer was furnished an outline of major elements relating to such matters as implementation/innovation/change efforts, research touching on P.L. 94-142 (including interpretations of the law, implementation data, and experience based on other major educational laws), information about rural life in general and rural education in particular (including rural implementation of P.L. 94-142), and the operation and effectiveness of cooperative entities, including ESAs.

The case study writer was also furnished with a set of summary statements that represented the staff's best thinking about the implications of the findings, as follows:

1. There are predictable problems with implementing top-down external mandates of any type.

2. Mandates/innovations imposed on schools are particularly troublesome because of the nature of schools as organizations.

3. The result is that the intent (goal) of the mandate is translated into something the system can bear. The final defining of the mandate comes at the street level regardless of what steps to tighten up are taken above.

4. P.L. 94-142 is particularly hard to implement because it is so sweepingly different from past practice, it fails to consider local capacity, it is underappropriated, and many essential features are missing.

5. On a national level P.L. 94-142 implementation suffers because of 1, 2, 3, and 4 above.

6. Rural schools are having all the general problems implementing the law plus problems that are specific to the rural context.

7. ESAs have emerged in rural areas partly as a response to P.L. 94-142. They are necessary to rural schools to be able to even come close to compliance, but they are not sufficient to overcome all the difficulties posed in 1 - 6 above.

8. The very nature of ESAs and their role in working cooperatively across LEAs causes problems. Collaboration is not well understood, although some ESAs deal more effectively with problems and are better at fostering collaboration than others.

9. States differ as to their approach to and recognition of ESAs. ESAs very in power, structure, and wealth. All of these impact effectiveness but effectiveness is enhanced by a good match between the operation of the ESA and the local context.

10. Rural/small schools suffer from the generic 94-142 implementation problems. In addition, they suffer because of rural constraints that make compliance even more difficult. Services cost more and typically there are fewer resources to start with.

11. Even so, services to the general special education population (ED, LD, MR) which rely on the relationships between regular and special education staff do not appear to be different across rural sites nor between rural and more urban sites. One exception is the sometimes more restrictive placement of students due to the unavailability of some services on a home-school or even home-LEA basis.

Now it must be stressed that the purpose of providing these research outlines and summary statements was not to sensitize the case study writer to data that would verify or falsify them but to provide him with inclusion/ exclusion guidelines. It seemed important not to eliminate information that related to or bore on these syntheses, in whatever fashion. Thus, when the time came to relate the synthesis to the field sites more formally (Volume 3 of this series of reports), the raw material for that task would be available. It should also be recalled that the staff were inclined to discount existing research somewhat because virtually all of it had been carried out within a conventional and not a naturalistic framework. The staff was prepared to be skeptical, but did not want to eliminate possibly relevant materials out of hand. The development of the research summaries protected the existing research from the staff's depradations as much as it protected the staff from being overly constrained by "what was already known."

Of course these early syntheses underwent considerable change as the staff's knowledge of the research literature, as well as its sophistication in interpreting it, grew. The reader may judge how much by comparing the materials cited above with the contents of Volume 3. Nevertheless, they were very useful guides to the case study writers and represented a major hedge against the risk of writing the cases in ways that would make their later articulartion with the research literature impossible.

Developing questions for Site Visit 3. The major purpose of SV-3 was to engage local participants in testing the case study draft for accuracy and credibility. But as the reader will no doubt already have guessed, the task of writing the case quickly exposed informational loopholes; places where additional new or supporting data were needed but were lacking. As the writing of the case progressed, the case study writer kept a systematic record of these questions, and suggested persons at the site who might be able to answer them. A secondary purpose of SV-3 was thus to seek out these informants and put the questions to them.

These questions seemed to take two forms. First, there were situations in which the case study writer was able to piece together available information into a "story line" which, on its face, seemed reasonable, but about which the case study writer was unsure. Sometimes several facts seemed to be missing; at other times conflicting facts were available between which the case study writer could not choose on available grounds. Usually in such instances the story was written in what seemed to the writer the most probable line. Once on site, it was hoped, specific informants could be asked about details, and/or a reader of the draft who happened to possess relevant information would note discrepancies and make his or her information available. Second, there were situations in which it was obvious to the writer that he was missing basic information; typically, a bracketed note was inserted in the draft acknowledging the failing and appealing to the local readers for clarification.

Abstracting problems/issues and generating lessons to be learned. Once the descriptive part of the case had been written, the writer turned to the development of the sections dealing with problems/issues and lessons to be learned. The former emerged in a fairly straightforward way; a major thrust of the interviews had, after all, been an identification and discussion of such matters from the respondents' point of view. The very descriptions of the local situation often made it plain what the problems were, and every attempt was made to "foreshadow" them in the descriptive writing so that the ultimate reader would be "primed" for their later discussion.

Generating lessons to be learned turned out to be somewhat more difficult. An early decision that had to be made was whether to focus on those problems that could be counted as exclusively "rural" in character or whether to include those that could also be found in non-rural settings. The need for that decision was aborted when it was discovered that there were no exclusively non-rural problems but simply problems that could be exacerbated in rural settings. Another decision revolved on the question of whether any lessons that might be deduced from the data ought to be included or only those about which some kind of policy recommendation could and would be made. That question involved the research team in lengthy discussions about the nature of policy; and whether it was the team's function to make policy recommendations or simply raise those matters about which some kind of policy statements seemed to be important. The team finally resolved the issue by noting that lessons could not be linked directly to policy; that the nature of the link depended on whether one was talking about policy-in-intention (for example, the goals or objectives or standing decisions of a policy-making group such as a board), policy-in-implementation (for example, the operational definitions made of the policy-in-intention by those agents who were responsible for carrying them out--sometimes called "street-level bureaucrats," Lipsky, 1980), or policy-in-experience (for example, a deduction by a parent that an ESA has no intention to mount, say, a TMR program because the ESA personnel, finding it impossible to locate an agency that could provide adequate services for youngsters of that type, delayed implementation altogether). "Lessons" finally came to be seen simply as broad guidelines or operational principles that one might deduce from the case experience, without, however, implying that policies could or should be derived from them. In fact, however, the lessons turned out to be an important source for the policy statements made in Volume 3 of this report series.

Internal Review and Revision of the Case Study

The draft of the case study was subjected to a stringent internal review from both the other visitor(s) to the site was well as from other research team members. Both the form and the substance of the draft were carefully critiqued.

With respect to substance, a number of items received explicit attention. First, those team members who had visited the site reviewed the report from the pespective of their own experience: did the case "feel right" to those who had been there? Did the report square with their own recollections of the facts, and if not, could references be found in the field notes either to support or refute the material in question? Since the writer had typically left a detailed audit trail such cross checks were greatly simplified. Second, the material was reviewed from the persepctive of those members of the team who were specialists in special education (not all were). If the draft had been prepared by someone other than a special education specialist, did it represent thinking that would "feel right" to those readers who knew the field well? Criticisms on this criterion ranged from the trivial (e.g., never use labels such as EMR or ED alone; always follow them with words like "pupils" or "youngsters") to the critical (e.g., just what is the implication of the term "FAPE" in Public Law 94-142?). Third, the draft was reviewed from the perspective of retaining anonymity. Was the writing such that (so far as possible) both internal and external anonymity were protected? Finally, the writing was reviewed to be certain that evaluations, judgments, or interpretations that appeared in it either represented those of respondents (and were then properly documented) or were underlined as a cue to the reader that the documents originated with the team.

With respect to form, the draft was critiqued both for organization and for style. The fiction of the "naive but sophisticated reader" was used as a point of reference; if such a reader were likely to be confused, then a revision was called for.

As a result of this internal review process each case study was put through multiple drafts; and, in one case, a shift in authorship.

Procedures for Third Visit to Each Site

The third site visit was planned to accomplish two purposes: (1) to provide an opportunity for a participant member check, and (2) to collect additional information needed to fill in holes or round out data in the case study. The first of these purposes is a major trustworthiness technique characteristic of naturalistic inquiry (see below); the procedures used in the present study were specially developed to meet this criterion, and hence will be spelled out in some detail.

Selecting the Review Committee. The major participants in the member check process were constituted into a local Review Committee which received the case study draft in advance of SV-3 and who offered their comments (in the main) through the feedback mechanism of an all-day review meeting.

The members of the Review Committee were selected by a complex process that involved decisions both on the part of the research team and of the local ESA director. Several considerations were taken into account:

1. The members were selected to be representative of certain basic "roles" or "stakeholding audiences," e.g., regular and special education teachers, administrators, parents, ESA governing board members. The exact nature of the audiences represented depended somewhat on local circumstances; thus, if the ESA operated a program involving itinerant teachers, the itinerants would be considered a special group of stakeholders. These stakeholder groups had all been represented among those respondents interviewed during the first and second site visits.

2. One representative from each of the stakeholding audiences was selected by the research team from among those persons interviewed during SV-1 and/or SV-2. In making this selection the team emphasized the openness, insight, and articulateness of the respondent during the earlier interview as the primary basis for selection; the intent was to include persons who could be counted on to make a fair and incisive judgment about the case. A second person from each stakeholding audience was selected by the Director (on whatever bases he chose) from among persons who had not been interviewed during SV-1 or 2.

3. Efforts were made to include representatives from as many of the member LEAs as possible. Directors were asked to make their choices from LEAs different from those selected by the research team.

4. As many different perspectives as possible were included. Team choices were in part guided by recollections (aided by field notes)

of the actual perspectives represented by each respondent. Directors were asked also to keep this criterion in mind. For example, the instructions to the Director concerning Reveiw Committee selection stated, "If our choice of principal is very supportive of special education, choose for your principal someone who is not supportive or less supportive."

5. Efforts were made to select only those respondents who had resided in the area and worked in the system long enough to have developed informed and reliable opinions. Directors were also asked to keep this criterion in mind, although it was suggested that they try to balance off long-time residents among those selected by the research team with relative new comers but who had been in the area for at least a year.

Delivery of Pre-Visit Packet. A week to ten days before the site visit was scheduled, a packet of materials was sent to the Director for distribution to the Review Committee members as well as to certain special respondents (described below). The packet contained a copy of the case study draft for each reviewer/respondent,[1] letters of instructions for reviewers, consent statements tailored to the special task at hand, and reviewer's comment sheets.

A copy of the letter to the reviewers has been placed in Appendix H. The reviewers were instructed in this letter to read the case and comment about certain items of interest to the research team, including errors of fact, errors of interpretation, missing information, missing interpretations, places where anonymity had been compromised, and the extent to which certain qualifiers such as "many," "most," "some," and the like had validity in the situations where they were used (e.g., is the statement, "Most teachers feel that mainstreamed youngsters are stigmatized when they are pulled out of their regular classes into resource rooms," valid? What percent of teachers would probably feel that way?). Comments could be made in any one of three ways: using the reviewer's comment sheets, which provided space in which the reviewer could record the page and and line number and write in a comment; writing the comments directly on the case study draft, in the margins; or making notes which could be used during the day-long committee meeting during SV-3 (see below).

The consent statements were tailored to fit the reviewing rather than the interviewing situation (as had been the case with consent forms for SV-1 and 2). Two forms were devised; one for use with persons selected by the research team who had previously been interviewed, and one for reviewers who had not participated earlier. The former essentially extended the consent given earlier; the latter went into more detail about project purposes. Both forms had two places for signature; one consenting to be a reviewer, and the second (which need not be signed) giving permission to quote comments if the research team wished to do so. Copies of both forms are included as Appendix I.

---

[1] The cover sheet warned the recipient that the draft was for his or her eyes only, and that to make it available to anyone else constituted a breach of confidentiality for which the reviewer would be solely responsible.

The comment sheets included two columns in which the reviewer could record page and line numbers of items about which he or she wished to comment, and a large blank space in which comments could be recorded. These forms were called for during the all-day meeting.

The All-Day Meeting. A full-day review session was held with the Review Committee during the first day of SV-3, usually after a short protocol visit with the Director. The committee assembled in the ESA headquarters. Their travel expenses were reimbursed from the research budget, as were replacement costs for those persons who were unable to attend unless substitutes took over their normal duties (e.g., classroom teachers).

Following the introductions, the agenda for the typical meeting took the following form:

1. A brief reminder of the purposes of the study.

2. An overview of the research methodology employed, including statements about the use of the member check as a trustworthiness criterion. The review committee's role was explained.

3. An orientation to the review process to be followed.

    a. Three levels of feedback would be entertained, in order: (1) a judgment of overall credibility reached through consensus--if the case study was not found to be credible, overall, there would be no point in pursuing the matter further; (2) statements about major concerns or issues that had emerged in reviewers' minds--it was anticipated that these would have been recorded on the reviewer's comment sheets and could be systematically treated; and (3) statements about factual errors that had been detected --it was assumed that these too would have been recorded and would be easy to check even if time precluded discussion during the review session itself.

    b. Three levels of agreement would be entertained: (1) complete consensus on some judgment, whether positive or negative to the case; (2) split consensus, in which some subgroup would maintain one judgment and other subgroup(s) might maintain others, possibly but not necessarily in conflict; (3) consensus of most of the group with dissent from one or two members. The three situations were intended to accommodate instances in which the Review Committee could agree, was seriously divided, or mostly agreed but with a strong minority opinion.

    c. Anonymity concerns would be taken up at a special point in the agenda to be certain that this contingency was covered to everyone's satisfaction.

    d. Time permitting, the Review Committee would be polled about the meaning of certain qualifiers (e.g., most, many, a few) that appeared in the text. These qualifiers were identified on a special form to be used if the agenda proceeded to this point.

4. Following the above explanations, the Review Committee moved through the three levels of feedback. A judgment of overall credibility was first solicited, followed by statements of concerns and issues, and finally factual errors. Time permitting, questions of anonymity and the meaning of qualifiers were also pursued. This session was interrupted for lunch (usually catered in to avoid a major time loss for a lunch break) and continued until the agreed-upon adjournment time was reached, usually four p.m.

5. Adjournament was preceded by statements of thanks and the collection of comment sheets and other notes from those who elected to turn them in.

Interviews with Special Respondents. During the second day of SV-3, the site visitors interviewed certain previously designated special respondents who fell into one of two classes: "elite" respondens who, by virtue of their positions, could be expected to have unusual vantage points for critiqueing the craft, and "knowledgeable" respondents who were expected to be able to answer all or some of the SV-3 questions. The elite respondents always included the ESA Director and several LEA superintendents. It would have been possible, of course, to include these persons as members of the Review Committee, but it was decided to deal with them individually for two reasons, first, because they could not be expected to devote a full day's time to the member check activity, and second, because if present it was likely that they would dominate the proceedings, virtually excluding the possibility of responses from persons considerable lower in the status hierarchy.[1] The knowledgeable respondents were selected because they were known to be so from previous interviews or because, by virtue of the offices they filled, they could be expected to have the special knowledge required.

Both the elite respondents and the knowledgeable respondents were asked to make any responses they wished to the draft, although of course this was the major order of business with the elites but not with the knowledgeables. Similarly, the elite respondents were also asked those questions about which they were knowledgeable even though this was not the major order of business with them (except for the Director).

In a few instances, the interview respondents made references to new documents that bore on the issues at hand; these documents were systematically collected and processed in ways similar to those used during SV-1 and 2. It was also the case that during the pre-arranged interviews attention was sometimes called to other unplanned respondents who might have special information; interviews were scheduled with these individuals as time permitted.

---

[1] The site visitors were not always successful in excluding these superordinate figures from the review session.

Debriefing. A final debriefing session in the style of SV-1 and 2 was held with the Director and whomever he designated to attend.

Final Revision of the Case Study

Upon return from the field, all of the materials that had been gathered were turned over to the case study writer, who always had been one of the SV-3 field team. These materials included: all reviewer forms that had been turned in; all those taken during the review session; and information relating to the special questions, arranged in the forms of answers to the questions as deduced from interview responses. New information was also systematically provided; that information was used in the development of the epilogs previously described. The writer revised the case study accordingly, and, after a final review and critique by research team members, the case was put aside to await further analysis and comparison with other cases later.

Trustworthiness

Naturalistic studies are frequently attacked because of their presumed lack of trustworthiness--their purported inability to measure up to the traditional standards of rigor, usually given as internal validity, external validity, reliability, and objectivity. Guba (1981) has proposed means whereby the trustworthiness of such inquiries can be substantiated in a convincing way. To do so, he has proposed, first, counterpart criteria for the four traditional criteria, and second, particular procedures that can be used to establish that each of the counterpart criteria has been satisfied at a reasonable level.

Counterpart Criteria. The need for counterpart criteria becomes clear when one recognizes that the traditional criteria are appropriate only within the epistemological framework that characterizes conventional inquiry. Conventional inquirers assert that they can claim internal validity for a study if its results are isomorphic to the reality they purport to describe.[1] But when reality is assumed to be multiple and intangible, as is the case with naturalists, what can such a criterion mean? Conventional inquirers assert that they can claim external validity if the study is carried out under conditions of probability sampling. But when sampling is done purposively/theoretically, and indeed, when a basic axiom of naturalist epistemology denies the possibility of generalization (a synonym for external validity), what can that criterion mean? Conventional inquirers feel that they can claim reliability for a study whose results are stable and replicable, but when designs are emergent and different investigators may elect to carry out a study along different lines, what are we left with? Conventional inquirers feel that they can claim objectivity for a study if there is a layer of "objective" instrumentation interposed between the inquirer and the object(s) of inquiry. But when the chief instrument is the inquirer himself or herself, does not that view of objectivity dissolve?

To deal with these dilemmas, Guba has suggested that while the basic questions to which these criteria of rigor are addressed are meaningful in naturalistic as well as in conventional inquiry, the particular operational forms of the criteria need to be replaced. The basic questions are simply these:

1. The question of "truth" value. How can one establish confidence in the "truth" of the findings of a particular inquiry for the respondents with which and the context in which the inquiry was carried out?

---

[1] One may note in passing that it is impossible to demonstrate external validity if the criterion is isomorphism, because, to do so, one would need to know what external reality is like. But if one already knew that, there would be no need to do a study of it. Conventional inquirers are thus hoist on their own petards. They get around this dilemma by asserting that their studies are aimed at falsification and not at verification, an approach which is not only unconvincing but rarely pursued in practice.

2. The question of applicability. How can one determine the degree to which the findings of a particular inquiry may have applicability in other contexts or with other respondents?

3. The question of consistency. How can one determine whether the findings of an inquiry would be consistently repeated if the inquiry were replicated with the same (or similar) respondents in the same (or similar) context?

4. The question of neutrality. How can one establish the degree to which the findings of an inquiry are a function of characteristics of respondents and context and not of the biases, motivations, interests, and perspectives of the inquirer?

Guba proposes that the conventional criteria be replaced with four new terms that have a better fit with naturalistic epistemology; these he has named, respectively, credibility (in place of internal validity), transferability (in place of external validity), dependability (in place of reliability), and confirmability (in place of objectivity). While space precludes a full presentation of Guba's justifications for these substitutions here, they may be briefly summarized as follows.

The concept of isomorphism between findings and reality as a means for establishing internal validity is retained, but, since the realities are multiple and "exist" in the minds of respondents, the isomorphism to be sought is between findings and the participants' mental constructions. If the inquirer's data are found by participants to have such isomorphism, they will be credible to them; hence credibility is the major criterion for truth value.

While the possibility of generalization is denied in principle by naturalistic epistemology, that axiom should not be interpreted to mean that findings from one situation will never be applicable to another. The question of the degree of applicability is, however, an empirical matter; it depends on the degree of similarity between the sending and the receiving contexts. What is "true" in one context may be true in another (transferable to it) if the two contexts are substantially similar on those factors that matter. The criterion thus becomes transferability; the degree to which it is met cannot be determined once-and-for-all but only in relation to particular sending-receiving contexts.

While naturalists are as concerned as conventional inquirers about the possibility of undependable changes that may occur within a study, they are not ready, as are the conventionalists, to ascribe all change to error. Since changes may occur by deliberate intent, as for example, when an emergent design is given a somewhat different direction as a result of new information, one would not wish to charge that change off to unreliability. Guba has proposed the concept of dependability to include not only the more or less random (or error induced) instabilities that conventionalists mean to include in the concept of unreliability, but also the more deliberate changes that are inquirer-induced. Error-induced change must be guarded against and prevented whenever possible, while inquirer-induced change must be accounted for.

Finally, naturalists, understanding that values play an inevitable part in inquiry and that inquirers and respondents always interact, prefer not to place the onus of neutrality on the objectivity of the investigator but on the confirmability of the data, a position which Scriven espoused in 1972. The nature of the inquirer's values and the degree or intensity of his or her interaction with respondents is no longer the issue; instead one asks whether the data produced are confirmable. Thus data confirmability and not investigator objectivity becomes the key issue to be resolved.

Operational techniques for meeting the trustworthiness criteria. If the four substitute criteria can be accepted as reasonable, the next question which must be confronted is the means whereby credibility, transferability, dependability, and confirmability can be established. Guba (1981) lists a variety of techniques for each criterion, noting, however, that not all techniques are equally weighty, nor is it likely that, because of time and resource constraints, all would ever be applied in the same study. His suggestions are these:

1. With respect to credibility:

    - Use of prolonged engagement--sufficiently extended periods of observation/interaction to overcome distortions produced by the researcher's presence and to develop adequate perceptions.

    - Use of persistent observation--intense focusing on those aspects of the situation most characteristic or pervasive of it.

    - Peer debriefing--sharing and explicating perceptions, feelings, and proposed next actions with uninvolved peers as an aid to planning, understanding, and catharsis, and to provide a source of challenge for developing views.

    - Triangulation--pitting a variety of data sources, investigators, perspectives (theories), and methods against one another in order to cross-check data and interpretations.

    - Collection of referential adequacy materials--collecting documents, films, videotapes, audio recordings, and other "raw" or "slice-of-life" data items to be stored (archived) for later use as touchstones against which interpretations can be tested.

    - Member checks--continuously testing data and interpretations with members of the various groups and audiences from which data are solicited. The process of member checks is asserted by Guba to be the single most important technique for establishing credibility.

    - Structural corroboration or coherence--checking the finished report to be certain there are no internal conflicts or contradictions.

2. With respect to transferability:

   ° Theoretical/purposive sampling--maximizing the scope and range of information gathered and hence, illuminating the factors most necessary to take into account when comparing two contexts for similarity.

   ° Thick description--furnishing full and dense descriptions which will provide a substantial basis for similarity judgments.

3. With respect to dependability:

   ° Overlap methods--using two or more methods, each with particular weaknesses, in tandem (overlapped) in such a way that the weaknesses of one are compensated (overcome) by the strengths of another; a kind of triangulation.

   ° Stepwise replication--analogous to the "split-half" approach in determining test reliability, dividing the team of researchers into two parts, each of which will deal separately with data sources which have also been halved.

   ° Dependability audit--using an external auditor to examine an "audit trail" maintained by the investigator (in much the same way that a fiscal auditor examines the audit trail provided by the accountant whose work he is to certify) to determine whether the research processes fall within the domain of acceptable professional practice.

4. With respect to confirmability:

   ° Triangulation--as that concept was defined above under credibility. Both credibility and confirmability may be served by triangulating sources, investigators, perspectives, and methods.

   ° Reflexivity--self monitoring, in which the investigator makes a serious effort to expose his or her own biases and predispositions; to uncover himself or herself as an instrument and to describe instrumental characteristics in the same way that a conventional inquirer might speak about the characteristics of his or her paper-and-pencil instruments.

   ° Confirmability audit--using an external auditor to establish the relation between the inquirer's claims and interpretations and the actual raw data, just as a fiscal auditor seeks to establish the validity of journal entries in terms of supporting documents such as vouchers, billings, or even special inquiries of original respondents; the "other shoe" of the dependability audit that verifies product.

The Present Study and Trustworthiness. Serious efforts were made in the present study to carry out the operational procedures suggested by Guba, but of course it was not possible to do all of them. Nor is it the case that the responses that were made were as good as one might have hoped. Yet it seems likely that, given the procedures that were carried out, the present study can be said to have a sufficiently high degree of trustworthiness to be acceptable on its merits. A brief discussion of how the study utilized each of these criteria will make the point.

1. With respect to credibility.

- Prolonged engagement was not as characteristic of the study as had initially been hoped. Nevertheless, it is the case that each site was visited on three separate occasions over the course of a year, and that at least two investigators were present for each visit. Sixteen man-days of actual site time is typical for each site. Thus the amount of contact is not trivial, nor is the nature of the contact superficial. Both sides had sufficient time and opportunity to feel one another out, to get comfortable, and to sense out key elements.

- Persistent observation was quite well attended to. Even during SV-1 salient characteristics were identified early on that became immediate targets for intensive study. Virtually all of SV-2 was shaped to focus on concerns and issues that had emerged in SV-1. SV-3 was utilized to extend certain areas in which doubt remained or data were deficient.

- Peer debriefing was not carried out with uninvolved peers, but with fellow research team members. Except for the first visit to Site # 1, only two research team members visisted a site at any one time. The other research team members, while certainly not impartial, were nevertheless "naive" with respect to a particular visit and could play the peer debriefing role in sympathetic if not entirely disinterested fashion. It seems likely that the catharsis and planning aspects of peer debriefing were accomplished, but it is dubious whether understanding was advanced as much as one might normally expect. Nor is it likely that the positions of the researchers were as challenged as they might (or would) have been outsiders in the debriefing role.

- Triangulation was a major focus of effort. A variety of points of view about issues were explored by the expedient of using respondents drawn from different stakeholder groups. Documents were used as a second point of reference. In some cases observations, e.g., of classrooms and board-meetings, were utilized to augment what had been learned in other ways. Non-verbal cues were exploited as a base for reinforcing or questioning information gathered verbally. Different investigator perspectives challenged one another during site interchanges and later data analyses. Special education perspectives were challenged by those team members who had more generalist backgrounds. In general, the rule was followed that no "fact" was cited unless it could be corroborated from at least two sources or it had been introduced by a respondent whose expertise could not be questioned on the matter at hand, e.g., the Director on a question of how the annual budget was formulated.

° Referential adequacy materials were not collected, largely because they were unavailable as normal residues of site activity and because the time on site militated against their systematic collection.

° Member checks, viewed as the most important technique for establishing credibility, were assiduously carried out: from interview to interview on a given day; from the respondents of one day with those of another; at the end of each interview with the respondent who had provided it; during the debriefing sessions that terminated each site visit; and of course with the elaborate processes of SV-3, which have already been described in detail.

° Structural corroboration and coherence were verified by the processes, first, of requiring team agreement on categorizing steps carried out as part of the data analysis for each site, and, particularly, through the steps involved in critiqueing and revising draft cases internally.

2. With respect to transferability:

° Theoretical or purposive sampling were carried out both with respect to site selection and respondent selection within sites. Of the various ways in which such sampling may occur, the research team elected to pursue a course that would lead to maximum variation--the type of sampling likely to expose the widest array of information and situations.

° Thick description is easily documented through the medium of the case studies themselves, each of which constitutes, in a sense, a "thick description" of the site which it covers. It will be recalled that readers of the cases who wanted to find elements that could be transferred into their own contexts were urged to find that case which seemed to them most like their own situations; empirical similarity between sending and receiving contexts is the key. Conversely, no attempt is made in the cases or in this report to derive generalizations which are applicable to all rurals ESAs.

3. With respect to dependability:

° Overlap methods were used only minimally. For example, nonverbal (body language) cues were used in tandem with interviews for reinforcement, and observation, which emphasizes the here-and-now, was used in tandem with interviewing, in which the respondent can range backward and forward in time. But it would be an overstatement to argue that overlap methods characterized the present study.

° Stepwise replication was not, strictly speaking, used. It is the case that each site was visited by a team of at least two persons, that team members operated individually in the field but shared insights on a daily basis and redirected their next days' activities by mutual agreement, and that serious discrepancies in their conclusions were mutually checked out with later respondents or other data sources. But no systematic effort was made to keep their work separate, nor could meaningful comparisons be made at this point in time between the data and interpretations of individual team members. The possibility existed but was not exploited.

° A dependability audit was carried out and is the backbone of the team's claim to having produced a dependable study. The auditor was Dr. Valerie Janesick, Assistant Professor of Education, SUNY, Albany, a nationally known qualitative methodologist. A short vita is attached to her report which is included as Appendix J. The audit took place in Lawrence, Kansas, on May 17-19, 1983, and tended to follow the algorithm for such audits previously developed by Halpern (1983). The major thrust of this approach is to confirm both dependability and confirmability; the algorithm requires the auditor to check, with respect to the former, the appropriateness of all methodological decisions, the degree of evident inquirer bias, and the utility of the overall design and implementation steps. With respect to confirmability, the algorithm requires the auditor to check for groundedness of findings, logic of inferences, utility of category structure, degree of evident inquirer bias, and nature of accommodation strategies.

The auditor was oriented to the Special Education in Rural America project at an opening three-hour session on May 17. This orientation included a discussion of the parallel research synthesis work and a description of the variety of product reports to be produced. The Halpern algorithm was reviewed and the auditor was familiarized with the variety of audit-trail materials that had been developed for the project. These materials included all field notes of interviews; all documents collected for each site that had figured in the development of the case studies; the decks of three-by-five cards that had been developed for each site onto which information from interviews (and at times, from documents) had been unitized; the category systems that had been devised from the cards; all theoretical notes (working hypotheses, hunches, concepts) that had been developed; findings and conclusions as represented in the five cases and the draft technical report; drafts of research syntheses; methodological notes detailing the nature of emergent methodological decisions and the reasons for them; audit trail notes (as found in the draft case margins and appendices); personnal notes as kept in journals; and the RFP and proposal (with related documents). The auditor worked individually with the materials on May 18 and 19; the formal audit period ended with a one-hour debriefing with the project team by the auditor.

The auditor's report is included as Appendix A. As will be seen, the report finds the study to be both dependable and confirmable. The interested reader will wish to consult the detailed statement; however, in the interest of reporting on methodological aspects here, it should be noted that the auditor found the audit trail and accompanying materials completely satisfactory for the purposes to which she wished to put them. Her comment, at the debriefing, was that she "stood in awe of the system [the project staff] had devised."

4. With respect to confirmability:

° Triangulation was carried out as described in the section on credibility; data were clearly determined by external forces and sources.

° Reflexivity was practiced as noted in the earlier section on journal entries, but did not result in a very satisfactory outcome, for the reasons noted here.

° A confirmability audit was conducted simultaneously with the dependability audit as detailed above. The auditor's statement (Appendix J) contains attestation appropriate to this trustworthy test.

Notes on Methodological Issues

Part II of this report outlined in some detailed the nature of the paradigm followed in this study as well as its implications for the research operations that would be followed. Needless to say, the application of this paradigm is still not very well understood. The purpose of this section is to indicate some of the issues that arose during the conduct of this study, and, where possible, to make some suggestions for how the issue might be better handled by other researchers applying this same paradigm under somewhat similar circumstances. The first portion of the section is devoted to the more practical issues and the second to the more theoretical.

Some Practical Issues

1. Contract/paradigm disjunctions. The present study was carried out under the terms of a contract with the National Institute of Education, Department of Education, which has well established contract procedures carefully monitored by a contracts officer, whose only concern is that contract specifications are adhered to and deliverables submitted on schedule. Such a process is entirely appropriate for normal contracts as, for example, for military hardware or office equipment. It is reasonably appropriate for research carried out within the conventional paradigm, with its *a priori* specification of theory and hypotheses, its carefully developed design, and its entirely predictable data collection and analysis techniques. But its utility for a study carried out naturalistically is highly questionable. Since the design of such a study is by definition emergent, a number of difficulties arise at once.

First, it is impossible to develop a "Scope of Work" statement that conforms to typical RFP requirements. Sampling, for example, cannot be specified in the usual way, nor can instrumentation (other than that the instrument will likely be a human being--a fact that is by itself repugnant to conventionally oriented monitors). A precise work schedule, milestone events (or times), precise data analysis procedures, and innumerable other features of the work, are equally difficult to specify. Yet the RFP that purportedly calls for a naturalistic (or qualitative or case study) approach may at the same time specify due dates for designation of the sample, may insist that interview questions be outlined beforehand and perhaps even submitted to OMB for approval, and so on. Clearly such requirements are inconsistent with the tenets of naturalism.

Second, since the RFP requires that *some* Scope of Work statement be provided, it seems likely that the statement will be written simply out of the need for compliance rather than as a serious effort to delineate *the* design. If one literally cannot tell in advance in what form the design will finally emerge or when its several steps will have been completed, but is nevertheless compelled to provide one, the Scope of Work statement can at best be a placeholder. That is not to say that writers of naturalistic proposals will not shape the Scope of Work statement to accord as nearly as possible with what will be done, but to suggest that even best efforts in that direction will *necessarily fall short*. Hence there will need to be *continuing adjustments* in the work plan--its form, content, means, and timing, requiring *continuing negotiations* with the program officer and through him or her, with the contracts officer. Given the conventional perspective, these frequent requests for changes will likely be interpreted as mere meanderings and vacuous vacillations that cannot be condoned. Resistance rather than cooperation is the likely response of responsible monitors. Each succeeding request is greeted with greater skepticism and unresponsiveness. The worst consequence of this state of affairs is that the researcher is influenced to stay on a "safe" course; to disregard his or her insights and to carry out the study within bounds already set rather than to define new bounds, however imperative it may appear to do so. In short, the very creativity with which the research act is presumed to be endowed is stultified by the disjunctions existing between contract procedures and naturalistic efforts.

Nor should it be assumed that these disjunctions have only such "theoretical" effects. A third and very major consequence has to do with fiscal allocations; these are specified in the contract and are tied closely to the Scope of Work statement. If the work program changes, must not the fiscal allocations also be changed? But obtaining permission to reallocate funds is even more difficult than gaining endorsement for a programmatic change--the latter usually involves only the program officer but the former involves the fiscal officer as well. And of course program changes without fiscal changes are meaningless. To be sure, the contracting agency needs to maintain some control over the funds it expends, but in the case of naturalistic research, what appear to be normal modes of control are wildly out of joint.

Finally, since RFPs are usually envisioned as encompassing a particular task whose parameters are known, it is not unreasonable, in conventional inquiry, to set a termination point that coincides with the design. At some point in time the questions should have been answered, the hypotheses tested, and so on. But this posture does not take account of the fact that naturalistic inquiry *diverges*--raises more questions than it answers--rather than *converges* on some specifiable outcome. The termination point of a naturalistic inquiry is always arbitrary; the research could always fruitfully continue. The feeling of, "If only I had known then what I know now," is common to naturalistic inquirers.

The end always feels more like a beginning. One is reminded of commencement speakers who like to tell graduates that they stand at the beginning, not the end. Or of the motto inscribed on the facade of the National Archives in Washington, "The Past is Prologue" (which a cab driver many years ago told the writer meant, "You ain't seen nuttin' yet!). Reports of naturalistic inquiry tend to have an "unfinished" (and unsatisfying) feel to their recipients, who have been expecting definitive findings and unarguable recommendations. Naturalistic inquirers do not aspire to such conclusions. They do not visualize knowledge as a map with certain areas remaining to be explored; if it were so, then one might believe that, sooner or later, everything could and would be known--the map would be completely filled in. Rather they represent knowledge with the metaphor of the earth in space. The earth represents the known, and the surrounding space the unknown. As the size of the earth--the known--increases, the amount of the unknown with which it is in contact also increases--and at a faster rate than the known. Good research always raises more questions than it answers. Its results cannot simply be aggregated into the already known; it may, in fact, produce a morphogenetic change that puts people's minds into quite different channels than before. Writers of RFPs need to recognize the tentativeness of naturalistic research, and contract and program officers need to display a willingness to accept the researcher's indeterminate shrug of the shoulders as a valid outcome of inquiry.

If the National Institute of Education or any other Federal or non-Federal funding agency is serious about encouraging naturalistic studies, the present form of the RFP must be substantially altered. Of course such changes require the concurrence not only of program officers but of contracts officers as well. It seems unlikely at the time of this writing that the Federal bureaucracy will quickly move to such an open posture, but in fairness, it does not seem likely that any other funding agency will soon move in that direction either. Yet a more open ended attitude is essential. The new paradigm of thought and belief requires a new paradigm of inquiry, and the new paradigm of inquiry requires a new paradigm of support.

A final word: it will be easy to dismiss the preceding paragraphs as the self-serving pleadings of a group of researchers who no longer wish to be bound by the normal requirements of accountability. The reader is reminded of two things, however. First, the pleadings are not concocted out of thin air; they have their roots in a powerful paradigm which has promise of providing a better fit to emergent patterns of thought and belief than its predecessors. Second, the adherents of this paradigm are not unmindful of the requirements of trustworthy research, as their preoccupation with procedures like member checks and external audits amply attests. It is not the absence of accountability for whicn they plead but a new form of accountability that is consistent--resonant--with their basic ontological position.

2. Design problems. To say that a design is "emergent" covers a multitude of thoughts and actions. Designs do not of course emerge out of the woodwork; they do not present themselves to the inquirer with a "Here I am; use me as you will" attitude. Designs must be pulled out of the context, the data, and the problem by the researcher who expends a

considerable amount of thought and energy to get that task completed. Here are a few of the dilemmas he or she must confront:

- Deciding on the sample of data sources to be tapped--sites, respondents, documents, and so on. We have noted Patton's categorization of different ways to select samples purposefully, and suggested that the choice made in any situation depends on the purpose of the study. In the present case two different modes might have been used; the choice between them was made on the practical grounds of what data were available. Moreover, the sample that is finally selected may to a considerable extent rest on judgments not of the researcher but of parties at the research site (e.g., ESA Directors) who cannot be said to be completely disinterested. Unknown biases may be built into the selection process. Of course, the naturalistic researcher believes that if normal methods of checks and balances are used--triangulation, seeking out respondents who have very different views from those already expressed, recycling sites and informants--that the probabilities of exposing such biases (except in the event of an unlikely massive conspiracy) are high. Nevertheless it does not pay to be naive about such matters; so long as the possibility of bias exists, and there are some advantages to someone somewhere in keeping information from the researcher (or providing only biased information), it is essential to continue probing.

- Dealing with time line slippages. Because of the emergent nature of the design, time estimates made at any point may prove to be quite wrong. The problem in relation to design is not that contractual obligations may have to be altered (that problem has already been dealt with in the preceding section) but that arrangements with sites may have to be postponed or otherwise altered. Dates of site visits are pushed back; delivery of materials, e.g., case studies to member checkers, is delayed or the time available for their inspection is foreshortened; and so on. It is wise for the researcher to be flexible about such matters, to anticipate that they will happen, and to be adaptable in responding to the contingencies so raised. Most important, the researcher should not develop guilt about his or her own failures; such slippages are a normal and expected part of naturalistic research and not necessarily a sign of incompetence. It is useful to recall that well-known corollary to Murphy's Law: things always take longer than they do. Or, the first 90 percent of the work takes the first ninety percent of the project time; the other 10 percent of the work takes the other 90 percent of the time!

- Providing time during which reflection can occur and appropriate decisions about how to develop the design can be made. There is a perpetual time conflict between the activities of planning and doing. In conventional research, planning is (theoretically) done in advance; once the project moves into the field, all that is left is the doing. But the naturalistic researcher faces a planning/doing conflict, which becomes especially acute while on site. The activities of Day 2 may literally depend on the outcome of the activities of Day 1--but those cannot be known until Day 1 is over. When then can the planning take place? The answer of course is during that time when normal persons eat, play, and sleep. It is not surprising that naturalists feel perpetually fatigued! The same problem occurs between site visits. What is to be done during Site Visit *2* depends on the outcomes of Site Visit *1*. And while decisions need not be made overnight, they must be made in the interval between *SV-1* and *SV-2*--and so on. And that interval is never long enough either, it seems. Again, the most important requirement for overcoming this hurdle is *awareness* that it *will* be encountered, and that it is not a matter of the researcher's incompetence but the normal state of affairs.

° Arriving at an appropriate focus for the study. It is not only the design which is emergent in a naturalistic study, but the problem as well. Indeed, critics of naturalistic inquiry frequently suggest that such research is mindless because it does not commence with a well-defined problem in the same way as does (purportedly) conventional inquiry. It is one thing, for example, to say, in a study such as this, "Previous research shows that rural sites suffer from certain problems; indeed, one can provide a list. Now let's see whether our actual site observations bear out these earlier findings." It is quite another to say, "Let's observe the site for a time to determine what *its* unique dynamics are. Then we can focus on those as the basis for the rest of the study." It is of course the latter position that was taken here. Thus *SV-1* was very open-ended precisely to permit uncovering things "we didn't know we didn't know" while *SV-2*, and to a more limited extent, *SV-3*, were directed toward more intense studies of those now-identified dynamics. The naturalistic inquirer must resist the press for premature closure--a press, we may note, set up not only by the contractual factors we have already reviewed but by the researcher's own intolerance of ambiguity and need for closure. Patience is the prime off-setting factor.

° Evolving a decision-making process. If designs are to emerge, decisions about next steps must be taken from time to time. Unless a definite process has been decided on, the design will, as its critics often charge, emerge haphazardly. Moreover, not all team members will be equally aware of the design decisions that have been made, nor of their implications for their own work. In the present study, techniques such as evening meetings in the field, team categorization decisions once back home, common critiqueing of evolving question lists for next site visits and of case study drafts, systematic journal entries, and the like, all helped with this problem. Critical is the establishment of some mechanism for dealing with these decisions and then adhering closely to it.

° Resisting changes that ought not to be made. A final design-related problem has to do with knowing when *not* to alter or extend a design. For example, in the present study there was a constant press to incorporate in the plans for Site *2* what had been learned from Site *1*. Some of these lessons could be fruitfully applied; for example, at Site *1*, a great deal was learned about how to schedule efficiently that could be applied at Site *2*. But the temptation is to apply not only *formal* but *substantive* lessons, e.g., if transportation was a problem at Site *1* it also is at Site *2*, and ought to be investigated. It was important to allow Site *2* to evolve on its own. Similarly, much was learned from the research synthesis, and the temptation always existed to test the conclusions of the literature in the sites that were visited. While there is much to be gained from bringing together the results of the research synthesis with the field study data, it is crucial that the field data not be collected with the syntheses in mind; else a connection is forcibly made that ought perhaps not be there. Of course, it is virtually impossible for a researcher to "cleanse his or her mind" of what is already known; nor should this statement be interpreted as a plea for adopting a "know-nothing" attitude. It does suggest, however, that the researcher needs to remain acutely conscious of his or her responsibility to permit data to emerge rather than to hunt them. Believing is seeing; it is easy to be deluded into finding once again what is already known.

3. Problems in the field. In conventional research most of the problems which the inquirer is likely to encounter will confront him or her while seated in an office; the problems are mostly worked out on paper, with a computer program, or, now and then, with a telephone call. Naturalistic researchers are not so blest, for their way of doing research requires face-to-face contact with respondents on their turf. And once you are out there, numbers of problems emerge; some examples:

° Gaining entre. Gaining entre is almost entirely a political matter. There is typically no way to force an agency or an individual to be cooperative; there can be a major hiatus between getting in the door and getting what you need. One problem of entre was solved in the present project by extensive consulting with knowledgeable informants about sites that were open to research; only such sites were contacted. To say that no site that was contacted refused to cooperate is not a very impressive victory.

But of course gaining entre at the highest level of the organization, in this case from the Director and sometimes, the Board, does not mean that entre will also be automatically extended at every other level. For example, the ESAs typically were composed of multiple sub-units, each with its own gatekeeper, and the LEAs involved each had their own extensive organizational structure. Entering a building to interview an itinerant ESA teacher did not obviate the need for a protocol visit to the principal, for example, who might just decide that he really wanted to sit in on the interview, or that the teacher was, after all, unavailable at that time.

Dealing effectively with gate-keepers who can deny or extend entre may be the single most important skill that the naturalistic inquirer needs to have. Without it the study will surely founder. Knowing that gate-keepers come in two types--formal and informal--and that both need to be dealt with, is equally important.

° Handling logistical problems. There is no setting in which the aphorism, "For want of a nail, the battle was lost," is more applicable than in the site visit. Murphy's Law will never find a more congenial climate. Travel arrangements, scheduling of interviews, travel from LEA to LEA, unexpected incidents that use up time (ranging from weather to the over-talkative principal who wants you to see every aspect of the school before he allows you to interview the teacher you came to talk to), accidents, failure of motel clerks to recall your wake-up instructions, and many, many other factors conspire to upset the smooth operation of the site visit. That such problems will occur is a certainty, and the researcher who permits himself or herself to be upset by these eventualities will surely fail to do adequate research. But while the specific contingencies cannot be foretold, their occurence can be planned for. To deal with them requires composure, aplomb, a dependable local contact who can man the phone on the researcher's behalf, and a variety of contingency plans: "what will I do if . . . ." With a little experience the naturalistic researcher can fairly predict the kinds of things that may go wrong and develop contingency plans to deal with them.

° Handling problems of trust. The naturalistic researcher can hardly expect a respondent to tell him or her everything that ought to be known after only a brief contact. Everyone has some information that they would prefer not to share: everyone makes mistakes, everyone wishes to put a best foot forward; everyone fills multiple and possibly conflicting roles, all of which make demands that must be met. There need not be a massive conspiracy afoot to account for reluctance to share information. On the other hand, it takes more from the researcher than presenting a "good guy" mien to inspire confidence in the informant.

There was a time in the history of field research when it was believed that trust-building was a matter of technique; that there were, say, six steps to building trust, and that if the researcher moved through those steps systematically, trust would be the automatic result. But of course researchers are no longer so naive. Trust must be built independently with each informant and must be renewed virtually on a daily basis to be meaningful. Trust is now viewed developmentally; it is something to be worked at. To build trust requires a constantly meaningful response to the question, "What have you done for me lately?"

It is beyond the scope of this discussion to deal with the many ways of building and maintaining trust that are suggested in the literature; the interested reader is referred to the many excellent sources such as Douglas (1976), Guba and Lincoln (1981), Reinharz (1979), and Wax (1971). It is unlikely in the present study, given that each site was visited for a total of eight days over the space of a year, that very adequate trust relations were built up, even with those persons contacted most frequently such as the ESA directors. Hence the results of the member checks are even more important than they might otherwise be; the review committee is probably the single most useful mechanism for checking out the information that is received. For while the ostensible purpose of the review is to give the local participate an opportunity to tell you whether "you got it right," it is also the researcher's opportunity to test whether "you gave it to me right."

° Problems of data recording. We have noted that for a variety of reasons, the decision was made not to tape-record interviews but to rely on hand-written notes (suitably augmented and refined as soon after the interview as possible). We have also seen that while some positive features were traded away by this decision, others were gained. Nevertheless, the process of hand-written notes placed an enormous strain on the interviewer: to get as much down as possible; to check verbal.vs. non-verbal communication; to record his or her own reactions and insights; and to do all of this for from six to eight interviews every day in the field! The task is literally impossible for the inexperienced interviewer. To perform it adequately requires practice (e.g., role playing), a tireless hand, a system of shorthand notetaking (which need not be Pitman but does need to be short), the ability to concentrate intensively for an hour to two hours at a time, and the ability not to lose one's own sense of commitment.

° Problems of personal reaction. Probably the two most predominant feelings of the naturalistic researcher in the field are loneliness and exhaustion. Despite the fact that the researcher is likely to be interacting with some one--respondent or fellow team members--for virtually all of his or her waking hours, feelings of loneliness are likely to be overwhelming because one seems to be so dependent on one's own resources. What comes out of the interview is finally up to you, and whether the design is appropriately altered tomorrow to take account of what you learned today is also a matter of how well you can communicate your own insights and suggestions. Nor do you have much time to cathart--while you're in the field, the game's the thing. And while all of this is going on, and your reserves of energy and courage are being plumbed, you have to get along with little sleep and hurried meals. After three days of a site visit you are likely to feel drawn through the proverbial wringer. Again, there is not a sure way to deal with these matters except to be aware that these feelings will come. Perhaps the best thing to do is to keep saying to yourself, "I can do anything for three days that I couldn't do for the rest of my life'" And then hope you're right!

4. Problems in writing the case study. The culmination of much naturalistic inquiry--and surely of this study--is the development of case studies which are the heart of the research report. Again a number of problems emerge, including:

° Evolving an appropriate style. The case study has multiple objectives: to provide the thick description needed to understand the site and to facilitate judgments of transferability to other sites; to portray the world of the site through the eyes of the local participants; and to provide the reader a vicarious experience of what it is like to be there, a kind of remote control "deja vu." It is probable that no case description can accomplish all of these objectives equally well; indeed, it is possible that they are to some extent in conflict. Thick description, moreover, may produce a mundane level of data that hardly qualifies as "seeing the world from local perspectives," nor is it likely to provide the naive reader with any feeling of excitement or identification.

Indeed, the question of the style to which the case should conform may be the most difficult to deal with. In the present cases an attempt was made to be somewhat informal, and to proceed more in a psychological than a logical order of presentation. Both principles were frequently abrogated, as can be seen from even a cursory inspection of their contents. It was particularly difficult to provide a "feel" for local perspectives without the extensive use of quotations, but two factors militated against that: the desire to provide anonymity to the respondents, and, more importantly, the impossiblity of getting exact quotations when the major data recording device was the handwritten field note.

It is likely that a different style more like the short story or novelette than a scientific report may be appropriate. It is said of Sigmund Freud that he was disappointed, when he wrote *his* cases, that they sounded so much like short stories, a characteristic he felt would not help him much to win over his hard-headed scientific colleagues. But we may note that Freud's cases nevertheless had a profound influence on the development of psychology.

The literature is not rife with examples of good case studies, and contains even fewer instances of directions to case study writers about how best to proceed. Probably more is known about how to write cases intended for use in training, e.g., the Harvard Business School cases, than for use in reporting research. There is a large gap to be filled here; perhaps progress will be made in that direction during the next decade given the present insurgence of interest in naturalistic methods.

° Knowing what to include or exclude. A case ought to provide thick description, but just what is that? How thick is thick? What are some inclusion-exclusion principles that could be applied by a case study writer to help in the decision of what the case should cover? There are at present no systematic answers to these questions; the writers in the present research relied on instinct and the critique of their colleagues.

As noted in the body of the report, two substantive considerations weighed on the minds of the writers as they went about their business: that they must include any material that might be germane to whatever emerged from the research synthesis, and that they should be mindful of policy considerations that might emerge so that such material would be included too. Of course, the research synthesis and policy recommendation teams were in their turn as much influenced by the case study writers as vice-versa--the condition of mutual causality was clearly evident. All three teams (field study, research synthesis, and policy formation, with their interlocking memberships) had to be on guard against being biased *unduly* by the products of the other teams. Again, there is no foolproof mechanism that can be relied upon to screen out unwanted influences; but being aware of the possibility that such influences might exist is certainly the first step in dealing with them, however inadequately. It is urgent that more attention be given to the development of sound principles that can be applied in such situations, however.

° Maintaining confidentiality and anonymity. It is the nature of naturalistic research and the case study reporting method that both are more susceptible to breaches of confidentiality and anonymity than conventional inquiry. Most naturalists are therefore very sensitive to the ethics involved and may go to extraordinary lengths to protect respondents and sites from discovery. Of course questions may be raised in cases of evaluation whether such protections *ought* to be extended since agents ought to be held accountable for their actions. But in cases of research it seems to be well established that respondents have a right to privacy, and, if they give up that right in a spirit of cooperation with the researcher, they at least deserve as much protection as the researcher can provide.

As we have seen, such protection may be difficult to extend and impossible to guarantee. Even if all the names and places and dates are changed "to protect the innocent," it is quite likely that other locals will be able to pinpoint the agencies and parties involved. And that breach of confidence may have the most serious consequences of all, for it is these other locals who may be in positions of authority or influence with respect to the research participants, and thus may have the most powerful sanctions to apply. At the non-local level, while it may not be possible to "guess" at the involved agencies and participants, it may nevertheless be possible to force disclosure should someone take umbrage. For example, let us imagine that someone in the Office of Special Education decides that if the situation at a particular site is as reported in the case study, that site is in violation of Federal law. Researcher files have no protections against subpoena; there is no special privilege involved. Even if the researcher has guaranteed anonymity, the courts may still insist that he disclose his sources, and he can be found in contempt of court should he refuse to comply.

Now it should be clear that these fearful contingencies are not very likely. It is not very likely that formal actions of any kind will be taken at the local level; informants have too many options for counteraction. It is extremely unlikely that the Federal government will bring suit against a local district because of the information contained in any of these case studies. Yet the possibility exists, and it is therefore incumbent on any naturalistic researcher to make all of these possibilities crystal clear in any informed consent procedure. Moreover, the respondent must be viewed as the owner of all of the data that pertain to him or her; the respondent must have the privilege of withdrawing from the study at any time, without prejudice, and take his or her data with him. Finally, the researcher has the responsibility of so coding and otherwise protecting the field data that the identity of respondents cannot be inadvertently discovered and that no person who is not a need-to-know member of the research team has access to the data. Anything less constitutes unethical conduct.

° Maintaining an adequate audit trail. We have noted that the case study writer is under obligation to document every assertion that is made in the case. Nothing ought to be reported as factual that cannot be triangulated (except in certain "expert witness" situations as noted in the body of the report), and records should be kept that permit an outside auditor to check the documentation should he or she wish to do so. But a number of questions emerge as one tries to abide by these guidelines.

First, for what is documentation required? Clearly it is for facts; if one reports that a county has 386 square miles, one ought to be able to cite a source for that figure. That kind of documentation is easy. But suppose one cites someone's judgment or interpretation. Now from the case writer's perspective, such judgments and interpretations constitute data--they are someone's construction--but they may not be open to triangulation (only one person may hold that judgment, but if it is a significant someone, the Director, say, the judgment can hardly be disregarded). Often too considerations of anonymity are involved; the person who renders an otherwise unsupported judgment may be well known for holding this intemperate view, and to cite it is to give away the informant's identity. Clearly there are no general rules that can be invoked in these cases; each must be decided on its own merit. That is also the case for the auditor; he may be willing to accept shaky, one-person untriangulated inputs under some conditions, but would certainly not be willing to have the whole case based on such!

There is also the practical question of how much a particular piece of documentation covers. The original cases had documentation trails recorded in the right hand margins; as one looks at these cases it is clear that sometimes there may be three or four different pieces of documentation cited in a single paragraph (sometimes triangulating sources for one datum but often multiple sources for multiple data), while at other times the writer apparently intended one citation to cover literally pages of material. Of course it depends on what the source is and what is being written about; three pages describing enrollments, per pupil costs, pupil-teacher ratios, and other data for the 20 LEAs contained within a given ESA may all be supported with one table from the state education directory. Again, both writer and auditor must be flexible.

Further, later sections of the case report, for example, those sections dealing with issues or lessons to be learned, may draw upon material that has already been documented earlier in the case. In such instances, is it appropriate to document the later material with earlier page entries or must the original sources be cited again? In the interest of saving time for the auditor, the rule adopted here was that earlier pages could be referenced. It was assumed that the auditor, having satisfied himself or herself once about the entries, would not wish to go to original sources a second time; the page reference would be a sufficient reminder, it was felt, of the trustworthiness of an entry.

Finally, as also noted earlier in this report, there is the question of when it is appropriate to close out a case. The draft case report was written after SV-2, but additional information was collected during SV-3. Should the case be updated to include that new information? The decision was made that if the information had been sought out to close a gap or clear up a misunderstanding in the case as written, it should be included, but if it were new information about occurrences that had taken place since SV-2, it would be included only in the epilog. The case of Site 1 provides a good example. Between SV-2 and SV-3 the Agreement binding the five LEAs into the county cooperative was up for renewal. Renewal was anticipated and assumed as the case was written, but it was also assumed that there would be negotiations at the renewal time that would fundamentally alter the funding formula involved. Instead, the Agreement was simply extended with absolutely no alterations in any of its features. To take adequate account of this surprising development would have meant substantial revision in the case without any concomitant gain in understanding relating to the research questions.

A simple epilog is sufficient to update the reader without burdening the research team with a useless task.

5. *Problems with the member-check (Review Committee) process.* The major purpose by far of *SV-3* was to carry out a member check, mainly through the mechanism of the Review Committee. This too engendered some practical problems:

° Determining an appropriate mix or range of respondents. There seemed to be little difficulty with the proposition that the Review Committee should represent each of the stakeholding audiences from whom information had been solicited during *SV-1* and *2*. An issue that arose, however, was whether Review Committee members should all be drawn from among persons who had been interviewed earlier, all from among persons who had *not* been previously interviewed (excluding key personnel such as the Director who of course needed to be involved), or some mixture of the two. Arguments could be made for all three positions. On balance, it was determined to use the mixture. It was felt that some informants who had been through the interview process were needed in order to attest to the fairness and thoroughness of the earlier procedures (should that question come up), and to the fact that the case study did reflect opinions actually proferred (at least by them) reasonably accurately. But it also seemed to be the case that limiting membership only to former interviewees might understandably introduce bias (although the team could not agree whether the bias would be for or against the case as written; arguments could be made both ways). The compromise provided a way out of that dilemma. Also, using both interviewees and non-interviewees permitted selections to be made in ways that would *increase* the scope of perspectives represented; so the ESA Director could be asked that if our principal is known to support special education, try to find a matching person who does not support it or supports it less strongly.

° Selecting respondents. However the Review Committee might be constituted, the question arose who should select the persons invited to participate. The research team felt that if it selected the persons, it could guard against the intrusion of local biases (such as might be introduced if the ESA Director were asked to make the selections), but it might also be vulnerable to the charge of "packing" the Review Committee with persons who could be counted on to render a supportive judgment for the case study. Conversely, if the Director (or some other knowledgeable local) were asked to make the selections, local bias might creep in, but it is likely that a more honest appraisal would be rendered. In the end, the decision was not made on the merits of any of these arguments but on the practical ground that only the Director could know who among the locals were competent, able, and willing to participate. As a hedge, the research team picked the Committee members that had already been interviewed. But of course even that hedge had its dubious side, because those respondents had themselves been picked by the Director initially. The team seemed to have little choice but to make the decision as it did and to live with it.

° Getting respondents to read and react to the draft case. Draft case materials together with the appropriate instructions and recording forms were sent in a single package to the ESA Director from a week to ten days prior to the scheduled SV-3. He in turn distributed the materials by whatever means he thought most expeditious--typically, the internal mail process already set up by the ESA for other purposes. It is likely that the respondents did not appreciate the scope of the task they were being asked to carry out, but it seems clear that most of them had not read the materials systematically. Rather they tended to scan them and to focus in only on those parts that they thought pertained especially to them. Hence they came to the Review session with only spotty notes and no clear perception of what the entire case looked like. Some had not read the case at all.

That this should have occurred is, in retrospect, not surprising. The task was large and the motivation to accomplish it small. In most cases the most that one could say about it is that it provided a day's relief from the otherwise humdrum routine of their lives. But even that judgment assumes that their daily lives are humdrum, which may very well not be the case at all. Some teachers could only be released on the provision of a substitute to replace them, and while that provision caused money to change hands, none of it found its way into the pockets of the Committee members. What they did they did in return for no visible recompense. They had a right to be selective in their reading and responses, and they were.

There seems to be no practical way to circumvent this problem. Member checks are crucially important and must be carried out. But to carry them out with disinterested and non-responsive reviewers seems not very wise. It is probably the case that every effort should be made, first, to communicate to the local executives and gatekeepers the importance the team attaches to this activity, and then, through them, to generate excitement and motivation among the reviewers to whatever extent possible.

° Covering the full range of matters that require response. Essentially the research team required two levels of response from reviewers: to be challenged and corrected on errors of fact or interpretation that found their way into the report, and to be assisted in correcting descriptions they provided even though not sure of the facts. The review process as constituted in this study seemed reasonably adequate on the first level but not on the second. Often entries in the case that had been "patched-up" in order to act at least as place-holders were overlooked, in the rush of dealing with those matters from Level 1 that the reviewers did bring up. It is essential that the team prepare ahead of time a complete listing of such places in the case so that responses may be specifically solicited.

° Determining the proportion of locals that would subscribe to a statement or opinion attributed to them. All of the cases were filled with statements of the form, "Most teachers feel that . . ." or "Some principals believe that . . . ." or "A few parents suggested that . . . .," and the like. Sometimes such assertions would have been made by respondents, and at other times the statement represented an inference made by the case study writer. It was deemed important to test these statements (insofar as time and energy permitted) during SV-3. Accordingly, forms were developed on which every statement of that type in the case was indexed by page and line. Reviewers were asked to indicate whether they agreed with the statement and if so, what proportion of persons mentioned actually felt that way or acted that way or opined that way, etc. So for example, a statement, "Most teachers felt that . . ." would be retained in that form if the Review Committee members could agree that at least 90 percent of teachers would feel that way. Other terms were used for lesser proportions.

° Keeping the meeting open. It was the intention of the research team to limit attendance at the Review Committee meeting to the members of the Committee. Unfortunately, at every site other superordinate personnel also attended at their own invitation, and protocol made it virtually impossible to exclude them once they were there. As might be expected, these "guests" contributed much of the discussion and it cannot be doubted that their presence kept some of the regular members from voicing their opinions. In fairness, it should be noted that some members were especially outspoken in voicing disagreements with their superiors, so it cannot be assumed that their presence was uniformly depressing. Nevertheless, it clearly would have been preferable _not_ to have them there. More strenuous efforts must be made in the future to make it clear just who is to attend review meetings, and why.

Some Theoretical Issues

1. _The feasibility and utility of trustworthiness measures._ Valuable experience was gained through efforts to apply the various trustworthiness techniques that had been proposed by Guba (1981). It seems appropriate to conclude that most of his recommended techniques could be reasonably well applied (although not all actually were), that useful information about trustworthiness resulted from these applications, and that the weight of evidence is that their use should be continued.

Specifically, with respect to techniques relating to the criterion of _credibility_, the most useful and most pervasive technique was the _member check_. While certain problems exist with respect particularly to the kinds of massive member checks carried out in _SV-3_, as outlined in the previous section, there can be little doubt that this technique is feasible, makes sense to participants, and results in a variety of information that is useful for shaping the case study into its final form. There is also no doubt that the variety of team editing and critiquing arrangements that were employed virtually guarantee the internal consistency of the cases (structural corroboration).

Other credibility techniques were less useful, and some could not be employed at all. There is some doubt whether there was sufficient _prolonged engagement_; it seems likely that this criterion can be met better in the kind of study in which a researcher spends considerable time, say six months or more, actually living at a site and interacting with it daily. Nevertheless, each site was visited for approximately 16 man-days each (more at Site #1 which doubled as a staff training site). And there was surely enough time to identify the more salient characteristics at each site which could then be subjected to _persistent observation_ subsequently.

Peer debriefing occurred to the extent that team members could serve as debriefers for other members engaged in other activities, e.g., Site #1 visitors could be debriefed by team members who had not visited that site; persons engaging in the research synthesis could be debriefed by persons whose primary responsibility was for policy recommendations, and so on. At the outset of the study it was believed that other members of the Department of Special Education at the University of Kansas who were not directly involved in the study could serve the debriefing function, but in the end, it was impossible to engage them in this way because of their lack of time. It is suggested that this function be provided for in project budgets so that the time and energy of a group of expert debriefers can be counted on.

Triangulation is a keystone technique and was well utilized in the present study. The easiest means to gain triangulation is by comparing information from respondent to respondent and from respondents to documents. The use of multiple perspectives (theories) is virtually impossible when the theory is itself emergent, and the use of multiple investigators, while used, is also discountable (in terms of the theory of triangulation) since the investigators made no effort to maintain independent (indeed, just the opposite was true--the investigators communicated continuously in the interest of the emergent design). The use of multiple methods was limited almost exclusively to interviews and document analyses; again, if more time had been available, and the researchers had been able to spend more time on site, other techniques, particularly observation, would have become feasible.

Finally, the use of referential adequacy materials, which had been considered a possible technique at the outset of the project, was not utilized at all. Because of the shortness of time virtually every scrap of data that could be assembled had also to be immediately used; the research team could not afford the luxury of archiving part of its data to use as a later benchmark. Again, in studies of greater length and site involvement, the use of such materials would not only have been possible but warranted.

With respect to the criterion of transferability, both techniques of purposive sampling and the collection of thick descriptive materials worked quite well and made few extraneous demands on the researchers. The problems already described under the practical heading of the preceding section summarize most of what needs to be improved; from a theoretical point of view all went well.

With respect to the criterion of dependability, there can be little doubt that the dependability audit is far and away the most pervasive and meaningful technique that was devised. While there are some practical difficulties and while additional experience will no doubt smooth away many of the rough spots that still attend the process, in principle the technique is enormously powerful. Indeed, it is so powerful that its use seems warranted not only for naturalistic studies but for all kinds of studies. We might note that if such audits had been done, most of the cases of "fudged" data (not T_1, in Ford's terms) that have recently been highlighted in the news would not and could not have occurred.

The other two techniques recommended by Guba for dependability were not used in the present study and indeed, may generally not be useful despite their face appeal. Overlap methods are little more than triangulation, and it seems not to be necessary to have a special name for this process here. Step-wise replication, while appearing to parallel neatly the split-half notion of reliability that has emerged in measurement theory, nevertheless is seriously compromised in naturalistic studies because of the need for continuous communication in the interest of the emergent design. If the investigators cannot work independently, would could the contribution of step-wise replication be?

Finally, with respect to the criterion of confirmability, what has been said about the dependability audit applies equally well to the confirmability audit; indeed, these two forms of audits are the two sides of the same coin, and probably could not be carried out meaningfully except in concert. Triangulation as a confirmability concept probably does not warrant an independent existence from triangulation s a credibility concept, except in the sense that whereas, in the latter case, it is a step taken to enhance the probability that a report will be found to be credible, in the former case it is a step taken to actually confirm data. The process is a means in the case of credibility but an end in the case of confirmability. Yet it is the same process. The remaining technique, reflexivity, did not work out as well as had been hoped as a way of describing the investigators-as-instruments. The logs and journals that were kept, while useful for some purposes, e.g., a documentation trail for the auditor, were not systematically kept for reasons already discussed. It is probably the case that such personal journals have little utility for the kind of research logistics that characterised the present study, although it is evident from other studies, e.g., those reported by Wax (1971), Douglas (1976), and Reinharz (1979), that the use of journals is exceedingly important for one-person studies that require a great deal of time on site.

In all, based on the experience of the present study, it seems appropriate to conclude that the following techniques are most useful and perhaps represent a sine qua non for studies of this type:

- For credibility: persistent observation, triangulation, and member checks.
- For transferability: pruposive sampling and thick description.
- For dependability: the dependability audit.
- For confirmability: the confirmability audit.

It might also be said that based on other research (Halpern, 1983), the audit may prove to be useful in helping to assess the credibility of a study, because it provides evidence of the extent to which the techniques of persistent observation, triangulation, and member checking were actually carried out, that is, the truth (T_2) of the researchers' assertions about what was done.

2. *Fitting the naturalistic paradigm: was the right model selected to guide the inquiry?* Every paradigm, whether a general and pervasive system of thought and belief, as suggested by Schwartz and Ogilvy (1979), or a particular one, such as the paradigm of naturalistic inquiry followed in the present research, rests upon a set of basic beliefs: assumptions or axioms that are taken to be True[1]. Now these beliefs cannot be either proved or falsified, but as in the case of the assertion that a God exists, certain evidence can be collected to shore up the belief. Is there any such evidence from the present study? Did the research team select the "right" paradigm? If they had it all to do over again, would they again elect to go this way? The answer to that question is "Most assuredly yes!"

The first of these beliefs is that there are multiple realities--the constructions of the participants--that may, in a very real sense, be the *creations* of the participants. Moreover, naturalists assert, those realities can be understood only as wholes--to dissect them into their supposed constituent parts is to destroy them. Is there anything in the data of the present study that supports *that* construction? Surely there existed no tangible reality at any of the sites that could be called *the* ESA. To be sure, there were buildings and busses and equipment and people, but the ESA is a more elusive concept that has very different meaning depending on whom you ask. That is the case not only from site to site, as one might expect, but from different kinds of participants at the same site and from different members of the *same* participant group at the same site. At Site #*1*, for example, *not all* of the itinerant teachers construed the meaning of itinerancy in the same way; at Site #*2* not all local superintendents viewed the advantages of being members of the ESA in the same way; and so on. These are not simply different perceptions, as though the ESAs *were* some particular thing that just looked different from different perspectives; the ESAs were *different creations in the minds of different people*. And of course they could not be dissected, not even the constructions of a single person. Although an individual might surmise the existence of certain parts related in certain ways, it was only in respect to his or her own single constructions that those parts and relationships could be conceptualized. Moreover, in that construction, the parts and relationships all shaped and influenced one another simultaneously; if any one of them were changed (Investigator to Respondent: "Imagine for a moment that you had a more supportive Superintendent in this school district. What would that mean for the problems you have just described?" Respondent: "Why, they would disappear of course. But we'll never have a superintendent like that. The Board wouldn't hire someone like that. If they did they couldn't get themselves re-elected! The local voters remember all too well what happened when they were forced to consolidate three years ago."), everything else would change too. The whole is more than the sum of its parts; everything correlates.

And did the interactions between investigators and respondents make any difference? There can be no doubt of it. Whether the reactions of the locals to the debriefing sessions, for example, were receptive or rejecting, they *did* react, and no doubt what they were willing to share during *SV-2*, depended a lot on the debriefing of *SV-1*. The cases themselves represent the ultimate evidence of the interaction; they would not have been possible witout the inputs of the locals and they would not be credible without their stamp of approval. Some of the issues and problems were not apparent to the locals until they had been pointed out by the research team; thereafter local constructions were undoubtedly different. In that sense the research team helped to create the local constructions, and many of their parts were indeterminate until they evolved from the researcher-respondent interaction. And surely many of the questions that the research team ultimately took to be important emerged because they were pointed out by the locals, who in that sense played a very real part in creating the research!

And is there any reason to believe that generalization would be a shaky activity in this research? What was found at Site #_1_, for example, that would be generalizable to Site #_2_, say, without taking account of local contextual differences? Transportation was a problem at Site #_1_, mainly because that ESA had chosen to deliver service with itinerant teachers; at Site #_2_ it was a problem because of the terrain; at Site #_3_ because of the variety of programs offered, at Site #_4_ because of water barriers, and at Site #_5_ because of vast distances. The generalization, "transportation is a problem," may be true in some trivial sense, but the how and why of it depends acutely on local contextual factors. If you as a reader would like some insight as to how transportation problems might impinge on _you_, you will need to look at that case which describes a situation similar to your own. Do you use itinerants? Is your terrain difficult? Are your distances vast? And so on.

What about causality? Can we not find instances of cause-effect relationships everywhere? Would anyone seriously question the assertion that the passage of P.L. 94-142 _caused_ mainstreaming to emerge as a classroom phenomenon, or that rural inability to pay high salaries and provide high-tech working conditions _causes_ teachers not to apply for positions there? Again the answer seems to be that life is not so simple. If there is causality it is mutual causality, and everything interacts to shape everything else. Causal assertions can rapidly become infinite regresses. What caused the authors of P.L. 94-142 to write the law in such a way that mainstreaming would occur? What caused the phrase "least restrictive environment" to be inserted? What caused lawmakers to become concerned about the handicapped anyway? And so on and so on? Surely the experience at these sites has taught us that everything is interrelated, and that while it may be possible at some instant to pull out a pair of phenomena and assert that one is the cause of the other, it is often equally plausible to say that the purported effect is the cause of the purported cause! If a simple causal linkage model were sufficient to explain a phenomenon such as difficulty in recruiting teachers, why do some teachers apparently _choose_ to come to the rural environment and why do some of them stay _despite_ the pressures to leave? Moreover, the circumstances underlying these choices vary from site to site; the teachers at Site #_5_, for example, cannot easily retreat to neighboring large cities as can those at Sites _1_ and _3_, and to some extent those at Sites _2_ and _4_. Doesn't the absence of this "escape valve" make a difference?

Finally, it seems quite clear that values also impinge on the study, and could not meaningfully be excluded even if it were possible physically to do so. What was found depends on values; how what is found is interpreted depends on values (to help the reader distinguish our value judgments from their value judgments, we underlined ours; could one otherwise have known the difference?). Moreover, it also seems clear to us that had we come onto these sites with questionnaires to be analyzed statistically, we would not have been greeted as favorably or been made privy to so much information as we were--our values as researchers were more acceptable to local values than researchers' values typically are.

From all of this we conclude that the use of the naturalistic paradigm to guide inquiries of this sort, at least, is well advised and well-supported.

PART IV
RESULTS

Introduction

The results of the field study are presented in this section in essentially the same order in which the questions were posed in Part 1 (pp. 3-4). In one instance questions on three highly related matters: Question 3 under Organizational/Governance Issues: Sources of Funding, Question 6 under Service and Delivery Mechanisms: Cost Allocation to LEAs, and that portion of Question 3 under Effectiveness and Impact Issues dealing with the impacts of funding or cost formulas utilized, have been combined in order to eliminate redundancy. In another instance, the order of the questions under Effectiveness and Impact Issues has been altered somewhat in the interest of maintaining a logical flow of thought.

The reader will notice that the answers given tend not to take the form of summary statements or generalizations. Nor are the observations buttressed by a count of the number of sites in which they were found. What is of primary interest is a description of the various patterns that are found; it is the ideas or concepts that count rather than the number of persons who mention them or agencies that exemplify them. The reader is urged to remember that the most important answer to every question must be, "It depends."

Organizational/Governance Issues

Question 1: Describe the membership and structure of the cooperative arrangement, how local agencies become members or obtain services, and what the incentives and disincentives are for participation. What factors influence board support of membership?

A special education cooperative may be loosely defined as:

- a collaborative organization of local school districts, joined together
- for purposes of brokering, developing, supporting, or providing special education programs and services,
- solely, or in partnership with one or more of the member LEAs, or with other agencies,
- sometimes, but not always, under one roof with other types of programs and services, which may or may not articulate.

That is to say, the Cooperative may function as broker (that is, arranger or agent), developer (for example, of program curricula and materials), supporter (for example, through consultation and technical assistance), or direct provider of special education programs and services, instructional and otherwise. The Cooperative may act in one or several of these ways as the sole agent, or together with other agencies which may include one or more of the member LEAs as well as external organizations such as the Association for Retarded Citizens or a local hospital. The Cooperative may simultaneously offer non-special education programs and services, such as accounting, media, library, and the like; these other programs and services may be offered entirely independently of the special education programs and services or may articulate with them in whole or in part. For Cooperatives, as with most other matters, variety seems to be the spice of life.

Membership in the Cooperative can be voluntary or mandated. In the former case, as is true of Riverhill County and the Northern Slope service agencies, LEAs may elect to collaborate under the stipulations of permissive legislation. In the latter case, as is true of Foothills, Midland, and Seaside service agencies, LEAs are mandated to become members of, or at least to articulate with, the agency that serves their geographic area. In some instances the service agencies of the mandated type also serve other state-level purposes, e.g., an intermediate state education agency or a supervisory district.

It seems likely that most of the LEAs involved in the five service agencies that were studied would not have become members without the stimulation of P.L. 94-142 and/or similar state-level legislation (which in all five cases preceded the passage of 94-142, even if only in anticipation of it). Even those LEAs that are members of "voluntary" units tend to feel that the Cooperative structure was "laid on," that the voluntarism was more apparent than real. The tradition of local control of schools is strong in these United States, particularly in rural areas, where the tradition is reinforced by strong commitment to local autonomy generally. Citizens fear a loss of control over their own affairs, a denial of discretion with respect to important options relating to their children, a challenge to their feelings of self-sufficiency and independence, a resulting loss of pride and loss of face. They have all too frequently encountered legislative mandates which require equal services but which do not provide for equal reimbursement in the relatively poorer rural areas. They do not want to be held responsible for the education of children--especially expensive-to-educate handicapped children--who live elsewhere and who may be culturally and ethnically different.

In rural areas particularly these feelings of losing control over their own affairs is exacerbated by the history of the consolidation movement. The burden of consolidation fell not on large urban districts but on tiny rural districts; communities whose sole claim to identity consisted of their school (and its athletic teams) were summarily deprived, they felt, of that solidifying influence. Most communities do not want the history of consolidation repeated with respect to the provision of special education.

The school personnel themselves, even though more overtly committed to providing adequately for handicapped students, tend to share the fears of community members. For administrators and school board members, even more authority is washed away. The school systems' authority must now be shared, at least with respect to an important and nationally recognized program segment. The LEAs tend to lose fiscal control over a major program segment that is reimbursed in part by both the state and national governments. Teachers must share their turf with personnel from the Cooperative.

For all these reasons, LEAs would resist becoming members of Cooperatives if they reasonably could. Even so, small signs of passive resistance remain: in some cases, the schools tend to operate on different annual calendars, with different daily schedules, different numbers of "in-service" days held at different times--even though to maintain such differences produces problems for the efficient operation of the cooperative. In their small way these differences illustrate that the LEAs retain some degree of autonomy after all. The feeling of enforced participation, although not visible to the casual observer, is there, just below the surface, waiting to be scratched. It is a force for policy-makers to reckon with; a force that not only diminishes local enthusiasm for participation but shapes and molds many of the political factors which, as we shall see, push and shove the Cooperatives along on their erratic courses.

But of course, every cloud has a silver lining; fortunately, virtually everyone--lay and professional--finds something, usually many things, about which to be grateful. The incentives for continued cooperation (or what gives the cloud its silver lining) include at least these factors, that the Cooperative:

- Facilitates (in some cases, enables) compliance with the requirements of P.L. 94-142 and parallel state-level legislation.
- Enables the provision of a quality and scope of services and programs that would not be possible given the typical LEA's lack of fiscal resources; the Cooperative, by combining resources, increases the fiscal viability of the special education programs and services.
- Increases the cost-effectiveness of the special education operation.
- Provides a source of help and assistance for regular classroom teachers who must now deal with handicapped youngsters with whom they did not formerly need to cope.
- Helps overcome the "big four" of rural constraints on program operation: distance, time, sparcity, and climate.
- Renders the LEAs more competitive in recruiting and retaining better and more specialized personnel.
- Spreads fiscal risk over a number of responsible agencies rather than requiring each LEA to be "self-insuring."
- Provides relief to the LEA and its personnel from the massive amounts of paperwork and other compliance activities.
- Shifts the operational responsibility for the difficult-to-manage special education programs and services from the LEAs to "other shoulders."

- Provides relief from the burden of accountability imposed by P.L. 94-142 and parallel state legislation; Cooperatives shift the responsibility for compliance elsewhere.

These are not mean advantages; all LEAs are pleased to be able to exploit them.

None of the Cooperatives that were studied were created de novo; each had precursor organizations, and often, the evolution of these precursors into the present cooperatives was the result of political "patch-work"--negotiation and accommodation. In some cases the historical evolution goes back well into the preceding century, and is often intermingled with issues of consolidation and maintenance of local autonomy, as for example, in the case of the Foothills agency which is one of 44 state-wide agencies originally established as "temporary" intermediate districts but which were later made permanent in order to avoid challenging local independence with more powerful political units. The political processes that brought the agencies to their present configuration are of course ongoing; there is no reason to believe that the evolutionary processes fueled by political considerations will not continue indefinitely, continually changing the face of the agencies. As we shall see, political processes and considerations impinge on virtually every aspect of agency operation, including steps taken to insure compliance (indeed, the very definition of compliance may be politically formulated), to label and place children, to manipulate programs, to train personnel, and the like. Local negotiations and compromises are continually ongoing. While the present study offers no evidence of it, it seems likely that even those agencies that are mandated by law, and hence are presumably similar throughout the state, differ substantially from instance to instance because of these local factors.

Of course, there are several advantages to an organization that has evolved from some viable precursor. It is already established, and need not engage in authorizing and legitimating activities of the sort that newly proposed units would have to endure. The compromises are already made; the community, both lay and professional, is familiar with the unit and its operating mode; there are few surprises. It is no accident that the five agencies studied, all at least moderately successful in carrying out their special education functions, have evolved from precursors, even the "voluntary" agencies.

All but the Riverhill County Cooperative evolved from precursors that had non-special education functions initially. These four precursors each played a role in the functioning of the state-wide educational system and the present agencies retain these functions and build upon them. That fact also has utility for the special education (presumably newer) portion of the activity. Channels of communication exist for seeking support and dealing with problems. Informal (political) channels of influence exist through which one "can get things done." The existence of a state network, of the sort in which all the precursor agencies took part, implies that services are available (as for example, SETRC in the Foothills agency). The several agencies are also in a form of competition; "service begets service," as was pointed to as one of the lessons learned from the Midland experience, and each agency becomes an exemplar for others to imitate. Finally, the ability of the several similar agencies to share *their* resources (a kind of super-Cooperative, even if informal), and to lobby jointly on behalf of their mutual interests, should not be taken lightly.

The evolutionary character of the process leads to another conclusion: things tend to get better with time. History is indeed more than the passage of time, and experience remains the best teacher. It is useful that the possibility for organizational growth and adaptation so clearly exists. The agency that believes that it has achieved a perfect state will soon fall into demise, for perfection and adaptability are in a perfect trade-off relationship. From that point of view one should be grateful that the Cooperatives are so far from perfect; there is room for growth and improvement.

We have already noted that LEAs become members in Cooperatives either by voluntarily forming one (although we have seen that even voluntary Cooperatives are believed to be "laid on") or by being legislated into one. Whichever route is taken, it seems plain that LEAs that *are* members of cooperatives are small. The average daily membership of the LEAs included in the five Cooperatives studied was on the order of 620 children; somewhat short of what one might expect the membership to be in one urban elementary school. Only one of the five Cooperatives--Midland--serves private and parochial schools, but in that case, the 14 such schools average a daily membership of about 170, even smaller than the public districts. But of course smallness is not in and of itself debilitating; there are in fact some advantages to smallness that should not be overlooked: bureaucratic simplicity; trust generated by the fact that everyone knows everyone else, and probably has known them since childhood; and more sympathetic and personal attention for the handicapped, who have also been known since childhood by everyone charged with their care. It should also be noted that larger LEAs do not have a good history of cooperation as compared to smaller; indeed, the larger an LEA is, the less enticing the list of incentives for cooperation that was noted earlier becomes. In the extreme, large LEAs are likely to want to break away from Cooperatives and set up their own full service program. In some states, like that in which Foothills is located, larger LEAs are already exempted from membership; in states like that in which Heartland is located, the larger LEAs have formed themselves into an effective lobby to persuade the legislature to give them independent status, and it seems likely that they will succeed in that effort.

The organizational structure of the Cooperatives seems to relate to two factors: the nature of the programs and services provided, and the nature of the relationship of the Cooperative to the state educational structure. So for example, in the case of Riverhill, the Cooperative functions primarily as a service provider; its staff consists of a variety of professionals many of whom are itinerants. Of course the small size of this Cooperative (one county) facilitates that posture. Foothills operates as a provider, supporter, and developer (it prides itself in developing new programs which are subsequently turned back to the LEA(s) once operating properly). Its staff is broken into five teams for support and development purposes, as well as to provide a means of in-service training for special education personnel. Northern Slopes operates primarily as a support service; its staff consists almost entirely of psychologists (although with some speech therapists also, since the speech program is operated directed by the Cooperative).

In cases in which the Cooperative has a formal connection with the state department of education (Foothills, Midland, and Seaside), primary supervision comes from one or several SEA bureaus. In all cases, however, the Cooperative has its own legally constituted board, whose members are elected or appointed by LEA board action.

Typically, the organizational structure is simple, with a minimum of supervisory personnel (many of whom also have direct service or support duties). Contact between the Cooperative and the LEAs occurs at various levels (local superintendents may be *ex officio* members of the Cooperative Board; the Cooperative Director may, formally or informally, seek input from superintendents and principals; itinerant personnel report both to a building principal and to a Cooperative supervisor, and so on), but operational contact is heavily concentrated in the hands of the regular and special education teachers who interact at the building level. We shall return later to the nature of this contact and the problems which it generates.

A final note is in order about the mechanisms whereby LEAs obtain the special education programs and services. Of course, in most instances LEAs are at liberty to mount those programs which they feel able to mount, that is, for which there is reasonable local demand and resources and personnel are appropriately available. In such cases, the LEA may turn to the Cooperative for support, consultation, or technical assistance services. But when the LEA feels unable to provide a needed program, it has essentially two options: to turn to the Cooperative, or to turn to some other agency, possibly another LEA within the same Cooperative that is running a program on its own, for service on a tuition basis.

In the latter case, the Cooperative frequently acts as fiscal agent or broker, assisting the LEA to find a suitable program and then to make logistical and fiscal arrangements to take advantage of it. Such services make minimal demands on the Cooperative and, in any event, occur only once or twice a year with respect to any particular service provider. The major activities relating to obtaining services relate to those instances in which the Cooperative itself provides a program, and an LEA wishes to include some of its students in it.

Several options for service provision exist within the five Cooperatives studied. In the case of Riverhill, for example, the range of services to be provided was specified in the Agreement binding the LEAs in voluntary association; it stipulates simply that the Cooperative shall provide those programs and services mandated by state law, and at a level to comply with minimal state requirements. The Cooperative operates (and is responsible for) the full range of programs (with the exception of a few tuition programs for rare handicapping conditions). A second option exists in the Foothills agency, in which programs are reviewed annually, and only those requested by one or more LEAs are actually undertaken. In this case a lengthy and complex process of making proposals for service, and contracting for those services, is specified; after a date certain a school district is committed to pay for services contracted, and must give 90-days notice if it wishes to withdraw from the program or service the following year.

A third option exists in the Northern Slopes agency, which is a voluntary organization in which LEAs can opt into or withdraw from Cooperative programs and services on relatively short notice (actually, these are programs arranged by the agency and supported by them but operated by one of the interested LEAs as the lead LEA). As that case shows, this flexibility is bought at a price: early withdrawal can be fiscally disadvantageous for both the withdrawing district and the district responsible for mounting the program.

In the main, Cooperative program and service offerings are locked into a permanent or reviewable schedule with options for withdrawal (or non-participation) being sharply limited in view of the fiscal problems and planning difficulties which greater flexibility would create.

Question 2: Describe the governance structure in terms of composition and role of the board of directors, the roles of the advisory committees which exist for special education services, or other means by which local agency personnel or the public are involved in decision-making.

Governance of the Cooperatives studied seems to be an "inside" matter, legally in the hands of the Cooperative Boards, but in fact managed at an informal level by the Directors and selected other administrators (depending on the particular site).

One cannot be much impressed with the extent of involvement of the public, or, indeed, of efforts made by the Cooperative to involve them. (We shall describe some of those efforts in a later section.) Except for the involvement of parents in the staffing (IEP) process, there is virtually no public input--and even parental involvement tends to be apathetic (more on that later as well). There are few advocacy groups, and few parental or public advisory groups. Where they exist, as in the case of Riverhill, these parental groups are seen primarily as communication links with the public; they are rarely proactive in policy formulation.

Each of the Cooperatives studied (except Seaside) has its own Board, and these Boards are elected by the School Boards of the member LEAs. The particular mode of election varies; in some cases, there is a Cooperative Board member for each member LEA; in one studied case Cooperative Board members represented "Director Districts" of about five LEAs each (the Boards of the LEAs in those districts elect the Cooperative Board member); and in one case, while there were no formally designated representational districts, clusters of LEAs, by "gentlemen's agreement" rotated the selection of Cooperative Board members among themselves as terms expired. The studied Boards ranged in size from five to nine members; their members tended to resemble (for obvious reasons) persons normally found on school district boards, that is, business and professional persons, and, for these rural sites, farmers.

Legally, these Boards are constituted with all of the powers normal to Boards. They sometimes select the Director of the Cooperative (where he is not otherwise appointed by the SEA), and always approve his staffing recommendations for other positions. They develop plans (usually for the purpose of contributing to mandated state special education plans); approve budgets (including where relevant the selection of particular reimbursement options); approve program and project proposals; develop Cooperative policies and procedures. Individually, they engage in committee work relevant to upcoming agenda items, serve as channels of communication to home LEA boards and to community members, and at times may be pressed into service to perform "gentle persuasion" on parents who may be reluctant to sign off on IEP provisions.

While it would be a mistake to characterize the Boards as "rubber stamps," it seems clear that most of the matters to come before them have been dealt with informally prior to appearance on the agenda. Indeed, the informal mode of operation seems to characterize most Cooperatives; at the studied sites, anecdotes were told (perhaps apocryphal, but always with a display of warmth, sympathy, and support from the teller) of how the Directors "got things done." Indeed, the ability to engage in informal politicizing seems to be a much prized characteristic in Directors and other administrators.

In this informal process Superintendents of member LEAs play a crucial role. In all cases, Directors make it a point to stay in close touch with them (and sometimes with building principals as well), reviewing important items and "getting their ducks in a row" before any formal hearing. In two of the studied cases the Superintendents actually served in advisory roles: in Riverhill, on a one-to-one basis with the Cooperative Board members representing their districts, attending Board meetings with them and rendering advice as needed; and in Northern Slopes, in which the Director has constituted an advisory board of all member Superintendents with which he works closely. The dictum of the Riverhill Director that, in his role, his chief functions were to serve as an "assistant coach," "coaxing and cajoling," is revealing.

The Board members reciprocate in their selection of a person to fill the Director's role. They tend to pick "one of their own," someone who has himself been heavily involved with school administration and who can be expected to understand and sympathize with the problems that confront the Superintendents of the member LEAs. Of course, that tendency may well be a plus; surely it is better to have an experienced rather than an inexperienced hand. And surely someone who understands local problems at first hand will be better able to cope with them when they impinge on Cooperative operations. But unfortunately, experience does not simply deepen understanding; it tends to block out options--the Directors know what can't be done.

On balance, however, the governance of these Cooperatives seems to be well managed. The public (and parents among them) are clearly not as heavily involved as one might wish. The operational arrangements are perhaps a bit too informal, and at times, a bit too "cozy." But to expect anything else would be unrealistic. It is important for policy makers to recognize that governance will always have such features; to develop legislation which assumes otherwise would be naive. Note, too, that decisions are made, programs are developed and mounted, and, all in all, handicaped youngsters are better served with the Cooperatives than without them. Moreover, if any of the characteristics that have been noted might be thought undesirable, it seems likely that they are less pervasive and impactful than they would be if special education programs were entirely in the hands of the LEAs.

Question 3: Describe the major sources of funding for special education services and for the unit as a whole.

and

Question 6 (Service and Delivery Mechanisms): How are service costs allocated to member LEAs?

and

Question 4 (Effectiveness and Impact Issues): that portion that reads: Describe . . . the impact of the funding or cost formula utilized.

The responses to the above questions are so intimately tied to the particulars of state reimbursement plans that it is literally impossible to speak about overall patterns. The reader who doubts that assertion need only look at those sections of the cases that deal with funding to be informed about the complexities involved. Furthermore, nothing stands still; state funding plans, like other aspects of education that are hightly politicized (recall, for example, the consolidation issue), are in continuous flux. What is true of a state this year may not be true the next. Indeed, this enormous variability is one of the chief sources of complaint at LEA and Cooperative levels; the task of keeping abreast of new developments is a difficult one indeed. Furthermore, this variability is even more gross when dealing with the funding of handicapped programs; everyone agrees that providing programs for handicapped students is more expensive than for regular students, but the precise nature of the weighting is a matter of great mysticism; different states use different weights and the same state will employ different weights at different times (a process euphemistically known as "fine tuning" the formulas). Nevertheless, the experience of the research team with the five sites that were studied does warrant some observations:

1. Cooperatives, whether dedicated solely to special education or also include other kinds of programs, draw their resources from only a limited number of sources. These include: direct billings to LEAs for services rendered (sometimes disguised under the heading of "tuition"); state reimbursements (which may flow through the LEA to the Cooperative; and may or may not include 94-142 "flow-through" funds); direct state payments (as for example, a state flat rate payment for administrative overhead); in-kind reimbursement (as for example, a Cooperative program mounted for a local junior college in return for favorable rental rates on space needed for media services); and outside contracts and grants (as for example, Title IV-C projects).

2. Money is recouped by the Cooperatives in a variety of ways as well. Charges made to LEAs (and others) for program services are usually billed as tuition; the charges are usually calculated by dividing actual and full program costs by the number of participants in order to arrive at the per-pupil tuition charge. Sometimes these charges include full overhead and at other times overhead may be charged under other formulas. Reimbursement formulas also vary depending upon the state. In some instances the basic unit for reimbursement is personnel time; thus, in Riverhill, reimbursement is for "program units" defined as a certain number of hours (annually) provided by a certificated teacher or by a paraprofessional (at half the teacher rate). Sometimes the basic reimbursement unit is student head count, typically weighted depending on the particular category of handicap presented by a given student. Or, the reimbursement unit may be actual program or service costs. Reimbursement under any of these systems is not full reimbursement in all of the cases studied; in Riverhill, for example, it is fixed by the state at 80 percent of the actual costs, while in Northern Slopes it approximates 40 percent (even though 80 percent is authorized). In addition, certain other items of expense may also be reimbursible, such as transportation costs, library and other instructional materials, diagnostic fees of specialists, and the like. Usually some rate less than 100 percent is applicable to these categories also.

3. Reimbursement funds recouped by the Cooperative typically do not come directly to the Cooperative from the state but flow through (actually, or as a book-keeping device) the LEAs. It is the LEA that applies for reimbursement, although it is typically the Cooperative staff that assists the LEA in doing the necessary paperwork (in some instances the Cooperative acts as fiscal agent and does all of the work itself).

4. Costs are allocated to member LEAs in different ways as well. In the case of Riverhill, for example, the Cooperative bills the five member LEAs in equal shares for the full cost of mounting the program. The entire cost of operating the Cooperative, less outside grants, is simply divided by five and allocated to the members. In other cases, Foothills, for example, administrative costs are allocated in equal shares to all members but program costs are allocated only to users--on a tuition basis as described above. Or, a portion of all costs may be pro-rated equally to all members, say, 35 percent, while other costs are allocated to members proportionately to their average daily attendance, say, the other 65 percent; this is the case in Northern Slopes.

5. Flow-through funds under P.L. 94-142 are also handled in different ways. Frequently the state department of education may retain a portion of these funds to operate certain statewide programs; Child Find, for example, in Northern Slopes. Or, the funds may be disbursed to LEAs as part of their total reimbursement package. Or, the funds may be sent directly to the Cooperative, which is in turn responsible for reallocating them to the LEAs. It might be noted that these P.L. 94-142 funds do not provide an exceptionally rich addition to the local coffers; less than 10 percent of funds spent on special education in the states is provided from this source. Because of the provision that these funds cannot be mingled with other state special education funds, or dispalce

these funds, richer states, for example, the one in which the Heartland Cooperative is located, have used the funds to operate new programs (Early Childhood Programs, in Heartland's case); in these states 94-142 does not contribute to regular special education programs at all.

6. Whatever else can be said about funding/cost/reimbursement patterns, one thing is crystal clear: this area is hedged about with problems. Among the more salient noted in one or more of the five studied sites are these:

a. Funds are in short supply. The programs mandated under P.L. 94-142, and/or its parallel state-level legislation, have placed a burden on LEAs which most of them are unable to shoulder. Further, since in many instances reimbursements are keyed to enrollments, dollar amounts are in decline just as enrollments are in decline, nationally. Add to those facts that fact that the nation is also in a period of economic depression and it is easy to see that LEAs--and hence their serving Cooperatives--have their fiscal backs to the wall.

b. Costs that are mandated are not fully reimbursed, and indeed, the appropriated reimbursement may be significantly below the authorized reimbursement. With few exceptions reimburseable costs are set at 80 percent of their value, and some costs are not reimburseable at all (often special instructional materials fall into that category). And at one of the sites studied--Northern Slopes--it was noted that the authorized reimbursement rate was typically paid out at only half value. Little wonder, given the "terrible threesome" of underfunding, partial reimbursement, and under-appropriation, that LEAs feel beleagured. Mandates are perceived as laid on but with little help to meet them. One is reminded of Joe Penner's invitation, "Let's have a duck dinner. You bring the duck!"

c. Equalization is not really equal. In rural areas, it seems clear, services cost more to provide because of such factors as sparcity, inability to attract competent personnel without premium salaries, transportation and other logistical costs, and the like. But equalization formulas do not take these factors into account very well, if at all. Add to that the fact that rural LEAs are often also poor LEAs, and the problem is further exacerbated.

d. Present funding formulas take account only of operational costs, not start-up costs. Programs that have been undertaken in response to P.L. 94-142 (or parallel state-level legislation) have required considerable initial investments, but these are nowhere compensated.

e. There is no insurance for the risks of undertaking and operating programs when the only method to recoup expenditures is by billing (in one way or another) for actual use. Programs undertaken on the strength of promised participation by N handicapped youngsters are in serious trouble if only N-1 or N-2 actually come, or worse, if, while the program is underway, some actually pull out. If youngsters drop out, all LEAs are liable for a higher per pupil cost than they had bargained for. If home LEAs are not required to make up costs for students who have dropped out, the Cooperative (or the LEA that is operating the program) may operate at a loss.

f. Reimbursements based on headcounts are highly unfair. What needs to be understood is that there is a certain base cost to mounting a program, and those costs are more or less constant regardless of the number of youngsters who may be served by it. When the number of enrolled students goes down (and especially when, as in the case of the Midland Cooperative, the headcount at issue is not just the handicapped count but the count of all students), reimbursement goes down, but program demand remains constant. Often the only recourse is to recoup the losses by reductions in personnel (these programs are terribly labor-intensive) which simply means poorer and less equitable services for the handicapped--again.

g. The severe fiscal problems reflected in the above observations pose an enormous temptation for local administrators to improve their fiscal position by reclassifying students into higher-weighted categories. A pupil assigned to a supplemental assistance program is weighted only 1.7, say, but if that same student is placed into a self-contained class, his weight jumps to 2.0, say. That simple act of reclassification produces nearly 18 percent greater reimbursement.

h. Formulas that work well at the state level may not work so well at the LEA level. Head count/weighting formulas work well at the state level because, given an *N* of the size that characterizes a total state, predictions of expenditures can be quite precise, thereby reducing the number of contingencies that must be taken into account in developing a state budget. But those same formulas may not be effective at the local levels, where the *Ns* are smaller and the numbers more variable. We may well encounter a situation such as that in Heartland in which funds are available--but simply happen to be allocated to the wrong district. It is of little avail to the administrator--who may have to wait a year for redress--to know that his neighbor is enjoying uncommon prosperity whilst he is pulling his belt tighter!

i. Finally, the mode of disbursing the funds gives rise to public relations problems for Cooperatives. On the books it appears that the LEA is having its money siphoned away to support a program being operated elsewhere. The Cooperative may be perceived as drawing off local reosurces without local consent--a kind of taxation without representation. All of this may be an artifact of the bookkeeping system employed, but the bad public relations that ensue can hardly be worth the small gain in legalistic precision.

Question 4: Describe the relationship of the multi-district organization, similar units within the state, and the SEA.

Leaving out of consideration for the moment relationships with other agencies for the sake of providing programs or services for the handicapped (a matter which will be taken up later), Cooperatives may best be described as highly insular. There are virtually no instances of non-programmatic relationships with other Cooperatives among the five cases studied--the Drivers of Special Buses Project undertaken by the Riverhill Cooperative and another Cooperative in the state being an exception. Instances of relationships with other types of agencies are limited to two: the collaboration between the Midland agency and a local community college, under which the agency provides certain training programs in exchange for nominal rental fees for needed media facilities; and the case of the Riverhill Director who made numerous contacts (NDN, LINK, state teacher and administrator associations, becoming a member of the Board of various noneducational organizations) as a way of generating new ideas while at the same time forming useful political alliances.

If we turn our attention to relationships between Cooperatives and the State Education Agency, we see a quite different picture, however--a picture of deep and intimate involvement. Indeed, it is useful to take even one further step back and ask about relationships between the Cooperative and its state environment, particularly, the state legislature.

State legislatures have an enormous impact on the forms that Cooperatives can take and on the degree to which they will be supported. They may lay on programs, as for example, for the gifted, not mandated by P.L. 94-142, and hence forming a further burden for local districts to carry. In two instances among the cases studied, state legislatures either cause evaluations of Cooperatives to be mounted, or receive evaluations of them done by other parties for their information.

But perhaps the best insight into the nature of the impact of state legislature-Cooperative interaction can be had by contrasting the situations in the states in which the Foothills and Northern Slopes agencies are located. In the former case, the legislature had a more than century-long history of interest in intermediate agencies such as the Cooperative. It has been very receptive and responsive to the needs of the handicapped, and developed legislation paralleling if not surpassing P.L. 94-142 before that latter law was passed by the Congress. But as a result, the legislature is also jealous of its efforts, and is perhaps overly bureaucratic and regulative in handling its affairs. It demands a great deal by way of compliance, but it also funds handsomely. Its consuming interest in school matters and especially special education matters, is simultaneously reflected in its open pocketbook and its heavy rulebook.

In the Northern Slopes case, the legislature is much less interested, historically, in either education or special education. While the Foothills state mandated Cooperatives (not only for special education but for a variety of other functions), the Northern Slopes state made the existence and joining of Cooperatives entirely voluntary. It strikes a neutral pose with respect to urging LEAs to join. It sets very few regulations. But, it also is niggardly in its funding, and indeed, it appropriates only about half of what it authorizes.

Thus, it makes a great deal of difference both to the form and to the probable level of success of a Cooperative what state it is in. The choice may be between a legislature of largesse that demands a high degree of stewardship, or one that is rather niggardly but permissive.

The state sets the context, but the state education agency sets the operating rules. And so it is to the SEA that the Cooperatives attend most; to them, the state is at once mandater, monitor, program ratifier, and funder. Indeed, the state department is the most powerful entity so far as the Cooperative personnel are concerned; they tend not to know much about Federal mandates or funding patterns, or national climates for this or that, but they are well attuned to those matters at the state level. Moreover, the state department is the final arbiter (within the educational establishment) for superintendents who seek variances in certification to be able to staff a program, for professional staff whose recommendation will not be accepted by reluctant parents, for program staff whose proposals are held not to be entirely legal, and the like. It is also the case that in those instances in which Cooperatives (e.g., Foothills, Seaside) are extensions of the SEA, they may have other official SEA functions to perform, e.g., act as agent in consolidation moves or supervise districts in its supervisory area.

Most of the effort to stay in tune with the SEA is carried out in informal ways, not dissimilar to the pattern we have already noted with respect to governance. If the SEA is the monitor, find out what they will be enforcing this year. If the SEA is to approve programs, find out what they want to hear about them. "Stay in touch" and "stay in compliance" seem to be the major informal guidelines.

Service and Delivery Mechanism Issues

Question 1: Describe the types of special education services available, and how they are provided to students with different types and levels of handicapped conditions.

Instructional programs. As the reader of the cases will appreciate, it is impossible to describe the kinds of instructional programs offered within one summary table, if for no other reason than that some programs are describable using the traditional categorical labels, while others are not. For example, in the case of Riverhill, we find the Cooperative directly involved in learning disabled (LD), emotionally disturbed (ED), educable mentally retarded (EMR), speech/language therapy (S/L), gifted and talented (GT), and vocational education programs--all traditional areas. They are also involved in contracting services for low incidence categories of handicapped students: trainable mentally retarded, physically handicapped, sensorially impaired, and severely multiply handicapped. On the other hand, the Foothills Cooperative deals with non-categorical programs: learning strategies resource room, individually based academic program, individual academic program--behavioral adjustment, basic life skills, and functional life skills--terms that require translation to be understood by anyone not directly connected with that state.

There are also significant variations from site to site in terms of which agency or agencies are primarily responsible for operating a given program. Some programs are operated solely by the Cooperative--virtually all of the Riverhill programs are of this sort. Some are operated by the LEAs (one or more) with the support of Cooperative personnel as consultants and resources--most of the Midland programs could be so characterized. Some are operated solely by LEAs with little or no symstematic input from the Cooperative--although the Cooperative may act as broker for other LEAs who wish to send students to that locally-operated program. We see examples particularly in Foothills and Northern Slopes. Some are coordinated or combined operations, with the LEAs and the

Cooperative having about equal operational authority and responsibility--these are rare but they do occur, as for example, the individually paced basic academic program in Foothills. Some programs are contracted to other agencies (more on this later) with the Cooperative acting as a broker to arrange the contracts--many low-incidence programs such as SMH or PH are of this type. But, it should be noted, no Cooperative operates exclusively in any one of these modes.

One may similarly note variations in the locale in which the programs are offered. Some are offered through the regular classroom, with the regular teacher having a consultant back-up. Some are offered in resource rooms (or other non-class facilities which ought not to be graced with the term "resource room"--perhaps a corner of the library or cafeteria). Others are offered in self-contained facilities, from which pupils may or may not attend the regular class for certain experiences. Some are offered in special facilities, sometimes located in a regular school building and at times at separate locations. In the extreme these special facilities may include institutionalization. And finally, some programs are transient, taken "on the road" to a convenient and variable place, depending on where the clients are to be found. Again, there is no systematic relation of these locales to program types.

It also seems clear that the scope and range of programs offered depends heavily on available resources. Riverhill, perhaps the poorest of the Cooperatives, provides only those programs mandated by state law: the "basic five," EMR, LD, ED, S/L, and vocational education; TMR, PH, and SMH; and, because of an unusual state mandate, G/T. Heartland, on the other hand, clearly the richest of the five sites, almost overwhelms one with its array of programs: the same programs as offered at Riverhill, including talented and gifted, but with two types each of EMH and LD programs (one resource room model and one self-contained model); plus programs for the autistic, homebound/hospitalized, hearing and visually impaired (again, with resource room and special facility models for each), two types of multicategorical rooms (RR and SC), and an elaborate pre-school program that includes home intervention teachers, infant/parent teams, parent classes, a toy lending library, and a series of developmental learning centers. A parent with a handicapped child free to select a state of residence would surely choose to move into the Heartland territory to gain maximum service.

Non-Instructional Services. Each of the Cooperatives engages in a variety of non-instructional services that are more or less related to their special education mission. Virtually universal are psychological services, consultant services, in-service training of regular and special education teachers, media centers and/or instructional resource centers, and vocational services, the latter typically associated with the vocational or occupational education programs. Services found frequently but not universally among the sites studied included transportation (usually provided as a supplement to the normal LEA transportation services), educational communications (ranging from mimeographed newsletters to radio and television programming), cooperative purchasing (which typically includes more than just special education), and financial services (bookkeeping, reimbursement paperwork, budget analysis services, and the like). Two of the sites engaged in fairly extensive curriculum development activities, and one in an extended program of parent training. More esoteric services included (one case each) microcomputer applications and printing services.

Some observations. It should be stressed again that the paragraphs just above should not be viewed as summaries or abstracts of what happens at a typical site; the reader cannot appreciate the program complexities extant without reading the individual cases. Yet some observations seem appropriate as working hypotheses, which ought perhaps to be checked in more detail over a variety of sites:

1. Programs appear to be similarly oriented regardless of whether they are categorically or non-categorically described. It would come as no surprise to anyone that at the Foothills Cooperative, the program labeled "Learning Strategies Resource Room" for the most part serves what would commonly be labeled as LD children; that the Individually Based Academic Program generally serves EMH children; that the Individual Academic Program--Behavioral Adjustment serves ED youngsters; that the Basic Life Skills Program is for TMH children, and the Functional Life Skills Program for SMH children. Similarly, at Northern Slopes, Significantly Limited Intellectual Capacity means EMH and TMH children, the Perceptual-Communication Disorders Program serves LD youngsters, and, the Significantly Identifiable Emotional/Behavioral Program serves ED children. A trained observer walking into these various program rooms, asked to label the children in it, would have no difficulty applying the conventional labels. There are of course many good reasons why conventional labels may be viewed as inappropriate; the shifts that we note in practice are scarcely more than convenient euphemisms.

2. Programs offered through these rural Cooperatives are essentially similar to those offered anywhere. The most significant element of differentiation seems not to be rurality but wealth--witness the variation from Riverhill to Heartland, for example. But even the Heartland programs do not seem to be much different from their counterparts at Riverhill--there are only more options. Learning disabled children tend to be served in resource rooms while EMH children tend to be placed in self-contained facilities. Formally there seems to be little difference.

3. There appears to be a "natural" division of labor between LEAs and the Cooperatives in that LEAs retain programs that can be operated in regular classrooms or resource rooms, leaving to the Cooperative those programs that are usually housed in self-contained or special facilities. LEAs keep the "easy" cases and send along the more difficult and those with low prevalence in the area. Of course several of the Cooperatives have openly espoused the policy of leaving to the LEA everything that it can handle reasonably well with its normal resources and staff; pride of ownership is, after all, an important element in the success of Cooperative endeavors. Nevertheless we may note here a tendency of LEAs to use the Cooperatives as a kind of "pressure valve" that will relieve them of those cases which they cannot cope with directly.

4. As resources become more available and Cooperatives extend the scope of their programs to accommodate more and more needs, a question quickly arises about which services and program are educationally legitimate.

For example, the Midland Cooperative experiences some difficulty in defending its provision of more peripheral services such as physical therapy, occupational therapy, social work, and nursing. There is surely no question that handicapped youngsters can profit from such services, but are they necessary from a teaching/learning point of view? The mandate of schools is after all not rehabilitation but teaching. To what extent are handicapped students at a significant educational disadvantage if they do not receive such services? Of course there is no simple answer to this question, but it seems likely that the development of criteria for making a determination of educational need should be given high priority.

Child Find. All of the Cooperatives engage in child identification procedures. In three of the sites visited, there is an annual child find effort run cooperatively by the state department of public instruction, the cooperatives, and local school districts. This effort might best be described as aimed at creating public awareness of programs and opportunities. Newletters may be sent to the LEAs parents and patrons, special "clinic days" may be mounted at which parents may bring children with suspected problems for screening, and newspaper, radio, and television announcements may be made.

Most of the referrals of children are made by school personnel, although there are also referrals from physicians, community health and welfare agencies, programs such as Head Start, the Association for Retarded Citizens, and of course, parents. But teachers and school nurses are the most likely sources, especially in those instances in which the school nurse routinely conducts screenings. In Northern Slopes, the Cooperative has mounted an program of activities which it asks each school building to undertake, including reviewing all children who fall below the 10th percentile on standardized achievement tests, as well as children who seem to school nurses or their teachers to require academic and perceptual screening. The program also calls for routine screening of all kindergarten children.

It is unlikely that a handicapped child who is already in school will remain undetected by one or several of the means available. Since P.L. 94-142 has been in effect for some period of time, it is felt by many that virtually all high-risk handicapped children have already been detected and inducted into the system. Indeed, the state government for the Foothills State recently rescinded state funding for child find efforts on exactly those grounds.

The most fertile child-find ground that remains is at the pre-school level. Here LEAs and Cooperatives feel at a distinct disadvantage. In most states there is no mandate or funding for pre-school programs; schools wishing to work the acreage must do so with their own resources or with grant resources from some external funding agency. In the latter arena they feel competitively inferior to such programs as United Cerebral Palsy or the Association for Retarded Citizens; the result is that they tend to abandon the ground to those agencies. At Midland, that situation does not exist, because it has been possible to utilize 94-142 funds almost exclusively for a pre-school program; the possibility that a handicapped child will remain undetected during those five preschool years is virtually zero.

Two other observations are in order with respect to the child-find situation. First, it is felt that in some instances, regular classroom teachers are over-referring children because they see referral as a way to rid themselves of problem children. Anecdotes surfaced at almost every site about the teacher whose referral was turned down, and who could not understand why the staffing committee would not classify the child in question as handicapped. But the problem of over-referral may not, in the long haul, be as disadvantageous as that of under-referral, which may occur for a variety of reasons. First, some youngsters who ought to be referred are not very visible; they are not troublemakers, they sit quietly, they are obedient. It never occurs to the teacher that this child has a problem. Second, it occurs from time to time that a handicapped youngster comes from a lower socioeconomic level; teachers are more likely to assume a case of undermotivation rather than handicap for them. Third, a child may not be referred because there is no program available; rather than make waves or be the stimulus for an embarrassing incident, the teacher simply neglects to note a problem. These are very different reasons for underreferral but they have one common effect: they deprive a child of needed services.

The Staffing (IEP) Process. When a youngster is referred as possibly handicapped, it is necessary to undergo a process of diagnosis and placement before he or she can receive any services. The basic building blocks of this process appear to be everywhere the same; but in practice each of the blocks is carried out in somewhat different ways by local agencies.

The initial evaluation may be carried out by an ad hoc or permanent team. In Riverhill, for example, the Cooperative school psychologist receives all referrals and screens them; assuming he believes they warrant further action, he appoints a Professional Planning Team which will be responsible for the case from then on. One of the team is named Case Manager. In Foothills, each LEA annually appoints a standing Committee on the Handicapped, consisting of a principal, school psychologist, guidance counselor, special education teacher, the parent of a handicapped child, and a physician; this team is joined by the referring individual if he or she is a member of the school staff. In Midland a multidistrict team called the Referral Management Team screens all referrals for the LEAs they serve. In this case a second ad hoc team is later appointed to manage the actual staffing.

The evaluation most often involves a school psychologist, but, depending on the nature of the handicap, may also involve physicians, nurses, guidance counselors, and others. Evaluations may also include interviews with the regular teachers and principal of the referred case.

It is at the staffing level that most variation in the process can be noted. Staffing in the simple form contemplated in the "bare bones" list above was soon found not to be practical for a variety of reasons: it is cumbersome, time-consuming, often embarrassing to the several professionals who may find themselves in public disagreement about the disposition of a case, and typically quite overwhelming to the parents. Hence a variety of changes have evolved. In Riverhill, for example, the staffing committee members may, sans parent, meet informally in a "pre-staffing" to reach a common decision that will be presented for discussion to the parents at the formal staffing. In the Foothills Cooperative, the staffing process has been divided into two phases; during Phase I the Committee on the Handicapped determines the case's overall needs and goals, decides on an appropriate placement program and designates the persons who will be responsible for implementing it. During Phase II, the designated agent--typically a special education teacher--working with the regular teacher (if appropriate) and the parents, spells out specific objectives and day-to-day lesson plans. Northern Slopes spells out a "Total Service Plan" as part of the formal staffing process, but then turns over to the designated special education teacher the responsiblity for developing the actual IEP. These several variations work to decrease the amount of time during which the staffing committee must meet and deliberate, tend to separate the decision process from the parents and hence reduce the amount of negotiating that must be done in their presence, and tend to shift the responsibility for developing the details of the IEP from the committee to the responsible special education teacher.

The remaining steps are fairly straightforward, being practiced in about the same way everywhere. The program is implemented in whatever ways have been specified, and is then reviewed on some systematic basis. Most common is the three-month (twelve-week) initial review, following by a fuller review on an annual basis. The total process is repeated triennially.

Most LEAs and Cooperatives appear to be reasonably satisfied with the methods they have evolved for carrying out staffing. Of course everyone complains of the paperwork, and it would undoubtedly be a blessing if more of the "boilerplate" required for the IEP could be computer-generated. Several of the Cooperatives are working on this possibility. Initially, too, the staffing process was characterized by long delays between referral and placement--in some sites it might take as long as a year for an unusual case to be resolved. But these delays are rapidly disappearing; as the backlog of cases is diminishing and the experience of the actors in handling them increases, one can confidently expect that expeditious handling will be the rule rather than the exception.

There are a number of comments about the follow-up on IEPs that should be made at this point. First, there were instances at all sites in which the "most appropriate" placement as recommended in the IEP was not actually made. Now it should be recognized that this "most appropriate" placement is that placement which is diagnostically or educationally most appropriate, not necessarily that which is most appropriate for the child in any wholistic sense. Too often IEPs focus on the particulars of the handicap to the exclusion of other factors. Ironically this posture is exactly that of which advocacy groups accuse the general population--ignoring the overall capabilities of the person just because he or she happens to be in a wheelchair, happens to have a learning disability, or happens to be on the low side of the IQ scale.

Seemingly inappropriate placements are sometimes made to redress this overemphasis on the handicap--most often because of parental pressures, but sometimes because of the insight of some particularly empathetic teacher or principal. But there are other reasons for altering IEP recommendations. Parents are sometimes concerned because the IEP-recommended placement may remove the child from his or her own school, away from his or her peer group (in which the child may be well accepted), condemn him or her to endless hours on the road--with all of its attendant traffic risks--and place the child under the control of administrators and teachers whom the parent does not know and cannot conveniently reach (again, because of time and distance factors). Moreover, general community culture acts to keep the child at home--there is an interest in "taking care of our own" and *not* taking care of someone else's. Recalling the concern over local autonomy, one can see that this posture is another reflection of that phenomenon.

Added to the above familial, social, and cultural factors is another very strong set--*financial* disincentives for making "appropriate" placements into a program out of the home community. We have already seen that placement in such programs is likely to occur only for more significant and therefore more costly served handicaps--for which tuition must be paid in larger amounts than it would cost to educate the child at home. Of course it would make no fiscal difference if these costs were fully and quickly reimbursed, but, as we have also seen, they are not. The fiscal liability for the home LEA may thus be considerable--and every such child places the home LEA at greater risk of budgetary overruns. There are also transportation costs to be considered--which usually are not fully reimbursed either. It is clearly to the fiscal advantage of the home LEA to keep all of its youngsters in its own buildings and in its own programs.

How can placements other than those recommended in the IEP be managed, legally? Is not the home LEA *required* to conform to the IEP mandate? Fortunately, from the point of view of local school executives, such extreme and costly options as appeal need not be followed--there are other easier and far less costly alternatives. In some states *rule exceptions* are possible; if the case can be made that an alternative placement will not be harmful to the child it is usually allowed. Or *trial placements* may be made, for 90 days, say--at which time the case will be reviewed. In these instances the LEA's resource room may serve as a kind of "safety net"--a place for a temporary assignment which buys time and provides the opportunity for the "friendly persuasion" of those who need persuading--parents, teachers, psychologists, or whoever.

But probably the most useful device is assignment to a "multicategorical room"--a room that may simultaneously serve EMH, ED, and LD youngsters. LEAs that have a low incidence of students in one or more of these categories might, under conditions of "appropriate assignment," send them to three different programs in three different locations. But by combining them into one room--allowable under many state laws--all these youngsters are kept "at home." Costs are held to a minimum and all of the problems of transportation and its attendant risks solved. Moreover, the teachers assigned to these rooms require, typically, certification in only two of the three areas--a fact that eases the recruitment/retention problem considerably (more of that later). There happens also to be an unexpected serendipity for EMH youngsters associated with this arrangement. Typically they are served in self-contained facilities, but when placed in a multi-categorical room they come in contact with non-EMH youth. Thus the multi-categorical environment is for them *less* restrictive than the ususal self-contained placement. Now multicategorical rooms are not always successful--recall the Riverhill experience, in which the Cooperative was forced to close down a multicategorical room servicing EMH and LD youth because the parents of the LD youngsters objected. But on balance, it is a useful arrangement, and one that resolves many of the problems faced by LEAs regarding assignment.

A second comment that might be made about IEP follow-up is that, as always, how well the program is actually implemented depends on the nature of the personnel who put it into action. Program is, in its particulars, determined at the classroom level; in the final analysis, it is more a product of the interaction of the specific people involved than of other factors such as funds or facilities. And when the IEP prescription involves *two* persons, as is the case whenever a child receives instruction in both regular and special settings--there are many opportunities for misdirection.

The regular classroom teachers are often not psychologically ready to deal with handicapped youngsters. They see their placement in the regular classroom (when it occurs) as simply adding to their burdens. Moreover, probably because of lacks in their training programs (more of that below), they rarely understand how to deal with these youngsters, understand that techniques different from those they normally find effective are called for. As a result they feel no *need* to become retrained, and tend not to take their in-service experiences very seriously. Further, although nominally included in the development of the IEPs, regular teachers feel little involved--tend to believe that their inputs are not honored. Some special education teachers fail to understand the regular teacher's unique problems; cannot emphathize with them; and therefore cannot offer very constructive assistance.

Communication is a problem all of its own. Even those teachers who understand the need for close continuing communication find the cards are stacked against them. For *both* teachers are expected to maintain *full time* instructional assignments. When will they find time for all of this communication--especially the regular teacher, who is completely out of control of her daily schedule? When the teacher has a free period he or she may be assigned some duty, or need to prepare for next-hour classes. Elementary teachers typically have *no* way to free themselves from the responsibility at least of maintaining order in a classroom if not actively teaching some group of youngsters. When, when, when . . . ?

The result of all of these factors is that the program so splendidly visualized in the IEP may become unravelled at the point of implementation. The single program often becomes two programs--the regular teacher goes on about his or her duties without much adaptation, and the special teacher runs a part-time special education program on the side. Program coordination is the exception rather than the rule.

A final comment may be made about the stigma which attaches itself to any child for whom an IEP mandates something other than normal school programs and routines. Stigma is of course simply one form of the more common phenomenon of stereotyping--making inappropriate inferences about some group because of certain visible characteristics that set them off. Of course, the more visible or severe, or the less understood, the handicap, the more severe is the stigma likely to be. Students become known as "dunces" or "stupid;" when they are bussed to a program center they are likely to be known there as "transports" who are housed in the "dummy wing."

It requires no special perspicacity to understand why stigmatization occurs. The Supreme Court said it best: "Separateness is inherently unequal." Special Education is special not only in the forms of education but in the characteristics of the youngsters it serves. And as we saw in the Riverhill case, the specialness need not be handicapping; even the gifted are afflicted by a kind of stigma!

The unfortunate aspect of stigmatization is that it is translated into action. The special youngsters are teased and made the butt of unfeeling jokes. Some youngsters (sometimes unbelievably abetted by their thoughtless parents) may feel fear and hostility. They certainly will make every effort to avoid socializing with the handicapped--and even that tendency may be unwittingly helped by school lunch room and playground schedules. The result: the handicapped quickly learn (even those reputedly unable to learn) that they have some shameful condition; they may become secretive about it and deny it; they may, when they finally are released from school, have become so thoroughly persuaded of the validity of the stereotype that it becomes a self-fulfilling prophecy.

Of course most special and regular educators are sensitive to this problem and make genuine efforts to combat it. If youngsters are removed from the special classroom for work in the resource room, their removal is done as unobtrusively as possible. Some states have mandated delabeling as a way of avoiding stigma--but of course, it is not the particulars of the label that count but the practice. A self-contained room is a self-contained room whether it is labeled "EMH" or "significantly limited intellectual capacity." Strenuous efforts are made--recall several examples from the Foothills agency--to develop and operate public awareness programs--and child-awareness programs in schools. These are clearly laudable efforts and deserve to be continued and redoubled. But it seems quite clear that, in these five sites, the problem of stigma has not been solved--nor is it likely to be in the foreseeable future.

Facilities. The casual visitor to at least four of the five Cooperatives included in the field study would not be impressed with the facilities, not, that is, unless he or she happened to be an afficionado of turn-of-the-century architecture. Those who may be concerned that the large expenditures being made nationally or at the state level for special education are being diverted from programs into lavish quarters for the staffs need fret no longer. Without exception, the buildings being used to house these programs are converted from some other--and not too similar--use, mostly, old school buildings, or, in the case of Foothills, an old resort hotel. We'll come back to the Midland case shortly, for it is indeed a story apart.

The general pattern is to house the Cooperative headquarters in such reconverted quarters somewhere near the geographic center of the catchment area, but to operate the programs in LEA (or sometimes rented) quarters. How the central facility is organized depends a great deal on whether the Cooperative is heavily committed to other activities and services in addition to special education, and what its functional posture is--whether, for example, it is primarily a service provider or a supporter. The former functional arrangement of course calls for housing more staff. Usually, too, in the central facility one can expect to find a media center and a library, the latter presumably stocking both print teaching materials and professional (in-service) materials. Unfortunately the collection found in such centers and libraries are usually incomplete and, to some extent, fortuitous--resources do not permit the systematic collection of most everything that would be useful to have.

Programs are decentralized to LEA facilities--to put them as close to the user as possible. But whether the spaces are self-contained classrooms or resource rooms, they are often not likely to be the best available. These Cooperative programs (and even those programs operated by LEAs for their own special education students) are likely to get, as one teacher put it, "the leftovers," spaces that were still available after all "normal" school functions had been provided for. Some resource rooms belie the name; they may contain few resources, and almost virtually none that a regular teacher might borrow to use in his or her own classroom. Moreover, in some cases the resource room may see multiple use--the speech therapist in one corner working one-on-one; an itinerant LD teacher with a group of secondary youth learning to read; and perhaps even the EMH teacher with his or her regular class of eight, who in a given building may find their self-contained class assigned to the resource room! Effective instruction cannot take place in such a Babel. Fortunately this latter situation is relatively infrequent--but it does exist.

If the exception proves the rule, then Heartland provides more proof than any reasonable person might want. It is the complete exception--an understandable one, since it is large, serves many counties and many LEAs, and is located in a state which prizes education and has just again voted itself another penny rise in the sales tax--all dedicated to the schools. Midland illustrates what conviction backed by money can do.

Like the other Cooperatives it too is housed, centrally, in a reconverted structure--but this time a more modern office building whose arrangement of waiting rooms and offices seems just right for the kinds of activities that go on there. But this central space is just the beginning. The Cooperative also has satellite offices in seven of the eight counties it serves, five developmental learning centers to house its pre-school program, and a number of instructional/ diagnostic centers in leased facilities such as churches, schools, and storefronts. It boasts not only a library and media center but a media preparation shop and a commercial quality print shop. It also supports a "Boys Ranch" for certain of its programs. Of course, the large majority of the special education programs are housed in LEAs (indeed, the Wonder Bay

LEA houses so many of them that it is often referred to as a mini-Coop), and some of the earlier observations about the quality of these facilities also apply here.

There can be no doubt that program and personnel are far more influential factors in deciding quality than are facilities. It may be true, as one informant suggested, that if the right person teaches a good program, even a barn will do to teach in, but, he went on to add, "Here we sometimes don't even have a barn." An overstatement no doubt, but something to ponder on. Unless you're Midland. Then you've something to be grateful for.

Private and parochial schools. The field study gathered very little information on the subject of private and parochial schools for the simple reason that only one of the five Cooperatives studied had such schools within its area. The exception was Midland, which serviced 14. By state law, these schools come under the purview of the director of special education of the Cooperative for special education services, which can be rendered on the grounds of those schools so long as it is possible for itinerant VI or HI teachers, or consultants working with teachers, to provide them. But these schools may not offer special education programs as LEAs might. If there are children in these schools who need, say, the kind of help given in resource rooms or self-contained classrooms, they must disenroll from the private or parochial school and enroll in the appropriate public school. Needless to say, this requirement is traumatic for many of the parents who feel they are forced into choosing between the greatest good for the child and their commitment to religious or philosophic principles. Their dilemma seems to be one of the prices our society must pay to maintain the separation of church and state.

Question 2: How are services monitored from the perspectives of both the LEA and the monitoring agency? What monitoring patterns appear most effective given the contexts of the particular sites?

The monitoring processes used in connection with the programs of the Cooperatives are straightforward. Essentially, there are two steps. First, the Cooperative (or, sometimes, the individual LEAs in conjunction with the Cooperative) devises an Annual Plan, which is submitted to the State Department of Education. The SEA is everywhere the duly constituted monitoring authority, and usually delegates this function to its Division of Special Education, or equivalent. The Division reviews the plan for conformity with state and Federal guidelines, which are published for the guidance of the locals. It may also review (triangulate) the Plan against other documents and reports filed by the Cooperative. In effect, this level of monitoring establishes that the Cooperative's objectives are appropriate as described by law. (We may note, in passing, that since state special education laws and P.L. 94-142 are typically very similar, the locals are unable to differentiate them and tend to assume that what they are dealing with are state requirements. Locals are typically unaware of the particular Federal specifications under which they operate.)

The second step, invariably, is a local site visit by an examining (or "validating") team of SEA personnel. The purpose is to examine actual operations to be certain that they conform to the previously approved specifications contained in the Plan. In effect, this step keeps the locals "honest." Site visit teams may look into the staffing process, the degree to which IEPs are implemented, the effectiveness of committee operations, the extent to which claims such as hours spent or miles driven are valid, or anything else it suits them to examine. [Note that the Seaside case differs substantially from these procedures and problems. Refer to the case for details.]

Now this eminently rational (or rational-appearing) process generates a number of problems:

1. There are typically few guidelines for the locals to follow in developing plans and reports. Experience is the best teacher here; "findings" of one year are avoided the next. The reader may recall from the Riverhill case, however, that in that instance "findings" were more often found to be errors of the examining team than true aberrations in local operations. So even experience may be misleading.

2. The process operates on an extremely tenuous assumption: that compliance equals quality. Of course it does not. At best compliance indicates that certain minimums have been met--and then not often quality minimums but minimums on some quantitative indicator--number of children served, number of hours spent, and so on.

3. The process is largely a matter of check-off. Since a list has been provided in the Plan, the committee need do nothing more than to check-off those items which it can find. Again, it is presence-absence that counts, not quality.

4. The process imposes an enormous paperwork burden on all of the participants. "Paper trails" must be left to which site visit teams can refer for virtually every program related performance. It is not unusual for special education personnel to report that they spend the the equivalent of a day a week or more in such "compliance" paperwork. Since there is so much other paperwork already involved, as for example, in the preparation of IEPs, this additional paperwork is hardly greeted with enthusiasm. It is moreover enormously wasteful of time and energy. Paperwork can never replace trust.

5. Some procedures and structures exist primarily for the sake of compliance and pose a wasteful burden on Cooperative personnel. For example, all of the sites have developed elaborate procedures for establishing due process with respect to IEP generation: who will do what under such and such contingencies. Many of these procedures are cited in detail in the case studies. Yet virtually no cases have ever been brought (and not too many seem likely).

6. As a result of all the above, Cooperative personnel exist in a debilitating "climate of fear" with respect to compliance. When any new act is contemplated, the first question that will be asked is whether, as a result, the unit (or some individual) would be found in non-compliance.

Discretionary acts that would have great utility (e.g., in making decisions about borderline cases) are often eschewed because they do not fit formal, published criteria exactly, and hence are not in compliance. And so on and so on. When local discretion is so hobbled, not only is the bugaboo of local autonomy resurrected, but handicapped children are served less creatively than bureaucratically.

Question 3: What are the procedures for hiring, training, and organizing personnel for intermediate agencies? What is the administrative relationship among IEU staff, LEA staff, and programs offered?

Recruitment and Retention. The situation with respect to recruitment and retention is perhaps best summed up in the plaint of one Cooperative Director who said, "I can't get 'em and I can't keep 'em!" Open positions are common in Cooperative budgets, and high turnover rates are also.

There are many disincentives that discourage a potential Cooperative (or LEA special education) staff member from accepting an appointment. Rural salaries are low and so are the annual increments. The feeling of some teachers is that they started low and get further behind every year. There is a lack of appeal in rural life for many candidates; most have no experience with such areas and dread their apparent isolation. Social life, they feel, is virtually non-existent, and what there is must be played out in a "goldfish bowl." There are many value conflicts as well; the values that characterize the American rural scene are not those that many of the more sophisticated, big-city raised and big-University trained teachers and administrators espouse.

Directors of Cooperatives feel that they nevertheless have some strategies available to them in the recruitment game. Some are willing to settle for persons of zero or low experience. They may look for persons trying to "break in" to special education who are not trained to do so--retreaded teachers, for example, who could not normally be certificated. But understanding state departments, realizing the recruitment difficulties faciling these rural cooperatives, may be willing to grant conditional certification waivers (the conditions usually involve enrollment in a formal training program and making reaosnable progress toward the accompanying degree). The Riverhill Director spoke glowingly about his strategy of "challenge and recycle"--challenging persons who are casting about for a mid-career change. Directors are likely to stress to candidates the "quality of life" which the quiet countryside affords --an escape or respite from city life, less hectic pace, outdoor attractions (especially useful in Foothills and Northern Slopes because of skiing and in Seaside because of beaches and fishing). But it seems clear that these strategies are only minimally successful; recruitment is still one of the toughest problems which Cooperative Directors face.

Retention is no less a bugaboo. Of course we may assume that those persons attracted by the different rural lifestyle may, once there, come to appreciate it even more fully and opt to say. But now other factors come into play which were perhaps not quite realized at recruitment time. The schools are small and the facilities are minimal. The paperwork burden is high. If the teacher is an itinerant, travel time begins to take its toll. The suspected lack of privacy is realized. Peer relationships are strained because they are so casual and, in the case of itinerants, so changeable. Alienation sets in. Burnout may follow, especially when the teachers who may be inexperienced realize the slow progress of their students, and how difficult it may to get additional training that might help break the log jam. And when these teachers recall that they do have options--special education personnel are, after all, in high demand--they may decide to seek their fortunes elsewhere.

Again, Directors have means for countering these tendencies to abandon ship. One Cooperative organizes its personnel into teams; the Director of Special Education is candid in saying that the function of the teams is at least as much to build and buttress morale as it is to devise program and provide training. A principal in Northern Slopes confronts his special education teachers with a set of "Coping Rules" to help them get along. But clearly the most effective means are those utilized in Midland; again, these are possible because of Midland's exceptional fiscal situation. They include higher salaries than are offered by local LEAs, and perquisites like travel allowances to national professional meetings (and encouragement to write papers and present them) and a handsome professional development stipend. Another possible strategy that seems not to have been tried, perhaps because of state regulations relating to their use, is to provide paraprofessionals to support the teachers (over and beyond client overload considerations). Such paraprofessionals are "cheap" and usually have local commitments that will keep them "on the job." But again, these strategies, real or possible, are not as effective as one might wish--particularly if one has the responsibility for getting staff to "re-enlist," as it were.

Organizing for service provision. As might be expected, service delivery takes many different organizational forms whose nature depends on a variety of shaping factors.

Perhaps the most important of these factors is the form of the service delivered by the Cooperative--whether direct or indirect. In some instances, as for example, Riverhill, the Cooperative offers and staffs all of the special education programs. In other instances, as for example, Northern Slopes, the LEAs offer virtually all of the programs, but with assistance and support from the Cooperative. In still other instances, as for example, Foothills and Midland, both the Cooperative and the LEAs operate a substantial proportion of the programs. From the point of view of personnel deployment, the Cooperative may consist of some combination of the following types, depending on the degree of direct vs. indirect service: special education teachers, resource/consultant personnel working with special education teachers in the field, resource/consultant personnel working with regular teachers in their home LEAs, and service personnel such as psychologists, social workers, and physical therapists, ad hoc itinerants who may be either consultants and/or direct service providers in particular instances.

A second shaping factor is the scope of service. In most cases the Cooperatives are centralized, that is, located in one central facility to which its personnel are administratively assigned, and, except for those working in self-contained classrooms, are also physically assigned.

But, as in the case of Midland, when the scope of service becomes very broad, decentralization may occur--to satellite centers, developmental learning centers, and even to a "mini-Cooperative" such as that at Wonder Bay.

A third shaping factor is that of contractual relationships with personnel. Personnel may be employees of the Cooperative or of the LEA. In Riverhill, for example, all special education personnel are hired by the Cooperative, while in Northern Slopes all instructional personnel are hired by the LEAs. In Foothills, there are some of each--although the number hired by the Cooperative are in the large majority. The nature of the hiring agency of course has important consequences for supervision, and, from the point of view of the personnel themselves, for employee benefits. The salary scale and the nature of tenure and retirement privileges may depend on just who the employer is.

A fourth shaping factor is the nature of the program. Programs for low incidence handicaps, such as TMR, SMH, autism, and so on, tend to be contracted to special agencies under contract/tuition arrangements. But when there is some division of labor between Cooperative and LEAs, the Cooperative tends to take on the "more difficult programs" and the LEA the simpler. Thus self-contained programs in Midland and Foothills are operated by Cooperative personnel, while resource rooms are operated by LEA personnel.

It is easy to see that various mixes of form, scope, contractual relationships, and programmatic nature can yield an enormous number of combinations of organization format. And, these are only the most salient of the characteristics involved. To see how any given combination finally emerges it is necessary to read the individual case studies. Curiously, the one factor that seems not to make a difference in how services are organized is whether the programs are categorical or non-categorical. It is, for example, impossible to tell what the organizational form is likely to be by seeing whether program labels are couched in such terms as EMH, ED, LD, and the like, or terms such as "Individually Based-Basic Academic Program" (Foothills) or "Significantly Limited Intellectual Capacity" (Northern Slopes).

Two prominent points of different that might be thought of as concomitants of organizational form have to do with the number of personnel that make up the Cooperative, on the one hand, and the communication patterns that exist among these personnel, on the other. The extremes in the five cases studied for number of personnel are Northern Slopes, with only six persons who make up the Cooperative, and Midland, with more than 250. Of course, the large number in Midland can be accounted for by noting the large number of LEAs served (45, plus 14 private and parochial schools), the large number of programs (including an extensive pre-school program), and the rich financing of that operation. On the other hand, this large number occurs despite the fact that the large majority of special education programs are operated by LEAs (175 out of 198). Thus, one cannot assume that there is perfect, or even dependable, correlation between the shaping factors and the kinds of personnel deployment one can expect.

Communication becomes exponentially difficult as the number of personnel increases and special means become necessary to maintain it. The two best examples are Foothills and Midland. In the former case, communication is managed to a significant degree through the medium of the team; five teams organize the teachers of the program into units which meet on a regular basis to discuss curricular projects, diagnostic services, and problems of all kinds. The Director of Special Education for the unit makes the point that the process involved in these meetings may be just as important, if not more so, than the product; it provides a means for developing a sense of identity and for supporting morale. In the Midland case, communication is managed by the device of the consultant, who regularly meet with each teacher; by satellite offices, each with its own manager who is responsible on a cross-category basis for all personnel in the satellite area; and via the large contingent of itinerant service personnel: psychologists, social workers, and the like.

Whatever the formal organization may look like, it is apparent that much, if not most, of the business of the Cooperative is conducted informally. Of course, Cooperatives are intended to be service agencies, and it is part of the lore of organizational theory that service organizations must rely more on influence than authority. It is certain that service organizations must be operated in ways that keep anyone from losing face.

We see the informal mode in action in these Cooperatives in a variety of ways. Governance is informal; much business is conducted through informal contacts, such as "showing the flag" or "coffee and chats." It is seen in the pre-staffing innovation, and in the use of "friendly persuasion" to line up parents who might otherwise object to the stipulations of the IEP. It is seen in recruiting and hiring patterns--Directors tend to be appointed from among "one of their own," people "who have been there" and understand the unwritten rules of the game. As much as anywhere, in the Cooperatives, "politics counts."

And always, but especially when business is conducted informally, it is the people who are involved who make the difference. Human resources turn out to be the most important assets that the Cooperative has. Cooperation fuels a successful program; negotiation and communication are eased when the people are committed, accepting, understanding, sympathetic, hard working, professionally well qualified, worthy of respect. It is easy to forget the importance of these qualities; they sound a little "corny," a little like the qualities claimed by each boy scout as he repeats the oath to be loyal, honest, trustworthy, and on. But over and over anecdotes emerged during these site visits to reaffirm belief in these aphorisms about human virtue. Recruitment and retention programs aimed at identifying and keeping these kinds of persons, and programs aimed at improving the extent to which they possess these qualities, are perhaps the most important that a Director can devise.

Form is not the only organizational constraint on effective functioning. Sometimes the role to be filled is defined too much by the characteristics of the predecessor in that role; the "shoes may be too big to fill," or, the earlier performance may have been so poor that everyone predicts failure again. Time and energy that might more profitably be devoted to other things must instead be focused on overcoming these expectational stereotypes. Or, roles may be placed in protagonist positions. The organization itself represents a trade-off, and hence a potential conflict, between local autonomy and more effective services for the handicapped. This conflict is reflected at other layers: between Cooperative Director and LEA superintendents and principals; and between regular and special education teachers. The latter conflict, coming as it does at the operational level, may be especially intense, ranging over relative responsibilities defined in the IEP (and who had input into forming those requirements), over sharing authority and responsibility for the child's program and the child's grade, and over the desire of the special teacher to "educate" the regular teacher about the needs of handicapped youngsters. Role-displacements also may occur; Cooperative teachers find themselves shifting from being service administrative personnel; from being doers to being sideliners. Moreover, these displacements often occur with no relief from the original role; efforts to discharge those other expectations as well involve inordinate demands of time and effort, leading to fatigue and to disenchantment.

There are also problems arising from the fact that Cooperative personnel are frequently itinerant personnel. The "windshield time" required is often the least of the concerns, which include demands to serve two masters, a loyalty torn between Cooperative and LEA, a lack of appreciation of the contribution being made, and, in extreme cases, almost as much stigma as is attached to the handicapped youngsters being served.

And, finally, there is the constraint of paperwork. We have already alluded to the enormous demands of "compliance paperwork;" added to that is the paperwork that goes with the job--scheduling, record-keeping, communicating with parents, updating the IEP, and on and on and on, it seems, endlessly.

Despite it all, one cannot help but be impressed with the dedication and commitment exhibited by the staffs of these Cooperatives. Their morale is uniformly high and they continually feel challenged--even if overworked. But it seems clear that greater attention to their oganizational problems is needed if this high level of morale is to be maintained. There is a need to respond to their needs with as much individualization as they exhibit in responding to the needs of the handicapped whom they serve. Each locale is different and has its own array of problems--and reinforcers. Boards and Directors must feel that they have the flexibility and freedom to respond in a meaningful way.

Training. It is difficult to be overly impressed with the provisions for training afforded to either special education teachers or regular teachers within the Cooperative framework. In the main, provisions for such training are conventional; the training is, moreover, rarely judged to be more than minimally effective. Among the techniques that can be found for special education teacher training in one or more of the visited sites are these:

° Workshops or seminars, most often conducted by the Cooperative as part of a regularly scheduled series. Usually only a portion of the program time is devoted to special education topics, which seem to be chosen more or less haphazardly (often, it is claimed, by "needs assessments" which turn out to be little more than questionnaire checklists). These workshops and seminars may be held prior to the opening of school and/or during "in-service days" during the school year. They may also be offered by the SEA, by a private firm, or at times, by regional and national associations; in the latter case, Cooperative staff members are reimbursed for attendance.

° Consultation, particularly in Cooperatives such as Northern Slopes and Midland in which most special education programs are LEA-operated and Cooperative personnel work primarily as consultants. Consultants may also be resource teachers, and, more rarely, persons brought in from outside the area.

° Courses, taken as local colleges or state universities, which Cooperative and LEA staff are "urged" or "encouraged" to attend. In Midland, courses are offered by the Cooperative as well; by state law, one-half the hours required for re-certification may be earned in such locally offered courses.

The preceding three techniques are found at all of the sites. Other techniques used in fewer places include:

° Modelling by a Master Teacher.

° Teaming.

° Stress reduction workshops.

° Self-training (in which one staff member takes the lead in teaching others, e.g., the school psychologist may teach other staff about test interpretation).

° Computerized library reference systems.

° Classroom intervisitation.

The techniques used for regular teachers are essentially similar but truncated. At the five sites, these teachers were served by in-service workshops and seminars (sometimes operated by the SEA), consultation, newsletters, and the same library reference system.

A variety of reasons is heard for the judgment that these programs are not very effective. Chief among these is the belief that teachers, either regular or special but more particularly the former, do not feel the need for additional training; the problem is described as attitudinal, and so the chief lack is often seen as a means for motivating teachers to want training. There are also practical problems, such as the limitations place on the amount of time that can be devoted to in-service in teacher contracts, different schedules followed from LEA to LEA, and inability of special teachers to command the respect and attention of regular teachers (a problem already described in several earlier sections of this report).

But most important in the failure of in-service education, it is asserted, is the failure of pre-service education. The schools and colleges charged with the responsibility to train teachers in the first place have been singularly inattentive to the special requirements placed on teachers by P.L. 94-142 and its parallel state legislation. Training of regular teachers is not coordinated with special education, or vice versa. Neither side is especially knowledgeable of the problems, or the resources, of the other. Regular teachers are not trained how to identify and exploit available assistance in working with handicapped youngsters, especially mainstreamed youngsters; while special education teachers are rarely trained as resource or consultant personnel and are oriented only to traditional service delivery models. Until the faculties of teacher training institutions themselves become attuned to the needs and possibilities, it is of course impossible to orient the trainees appropriately. The failure in practice for special and regular education to work together stems, ultimately, from the failure of teacher trainers of both stripes to relate to one another. In-service training cannot do the job unless the teacher is made receptive to it at a tender age.

Administrative relationships. There are three different kinds of administrative relationships between Cooperatives and LEAs that are worth commenting on. The first of these concerns the relationship between the Cooperative Director and the superintendents and principals of the member LEAs. There is no instance in the five sites visited in which this relationship could not be characterized as "good." Superintendents have input channels into the decision-making process, and it would be rare for a decision to be reached in which concurrence was not tested before the decision was put to a vote. Much of this relationship is carried out via "coffee and chat" (to use the term suggested by the Riverhill Director); "keeping in touch" is an important function of the Director. Generally superintendents are pleased to have someone willing and able to relieve them of the burden of attending to special education mandates. Of course the Cooperative Director may have an occasional problem because he or she sometimes is required to "wear two hats," as in the case of Foothills, whose Director is also area superintendent, and of Midland, in which the Cooperative is also charged to supervise school consolidation activities. But relationships are good and communication is easy.

A second level of interaction occurs between Cooperative consultants and LEA superintendents and principals. These consultants may be seen by the principal as competing supervisors, and the question of relative authority may come up. Or, the consultant may be coopted by the administrators, as in the case of Midland, where, instead of working with teachers only, Cooperative consultants are mainly consultants to administrators, helping them with the enormous paperwork requirements and reviewing their activities to be sure that they remain in compliance. But while this role displacement may be onerous for the consultant, it generally breeds good will with the administrator who is being helped; the relationship tends to be quite positive.

A third and difficult level of interaction occurs between Cooperative personnel and LEA personnel who are involved with handicapped students, either as regular teachers of classrooms that have some mainstreamed youngsters assigned to them, or as teachers of self-contained classrooms that happen to be LEA-operated. The former are regular teachers and the latter special education teachers, but the Cooperative personnel in either case come onto their turf to work with them. Several problems arise immediately for the Cooperative staffer. There is the matter of loyalty--is one's primary loyalty due to the Cooperative or to the LEA? There is the "two masters" problem--when entering someone else's turf, to whom is one responsible--principal or Cooperative Director? If the frequently stated principle--that the Principal sets the tone for a building and is chiefly determinative of the quality of what goes on there --is valid, is it not important to have him or her on one's side? Principals are described by respondents as falling at different places along a continuum of responsiveness; he or she may be very accepting and supportive of special education, or may not be, generating negative feelings toward the special education personnel and programs from everyone else. What if one's principal is of the latter sort; to whom should one be loyal? Whose leadership should one follow? Or again, some principals may feel completely incompetent to supervise special education instruction, virtually abdicating their normal responsibility for what is taught in their buildings. Should one then look for leadership elsewhere?

Despite all these potential problems at the principal's level, it seems apparent that in these five LEAs, at least, relationships with administrators are reasonably satisfactory. Most everyone--teacher or principal--is aware of the potential for difficulty in the relationship and works at minimizing that potential. And it is perfectly clear that there is nothing inherent in the nature of Cooperatives that increases the likelihood of bad relationships. In practice, most administrators are grateful for the assistance they receive and do what they can to simplify its delivery.

Question 4: How are parental involvement and due process provisions carried out within an intermediate agency?

Parental involvement. Parent involvement varies considerably within sites (owing primarily to socioeconomic factors) and substantially across sites, owing again to socioeconomic factors and the efforts of LEAs and Cooperatives to foster meaningful involvement. In the worst cases, parents' level of awareness is low; their lack of information about such matters as the nature of handicapping conditions, their rights, the processes followed by the school, and the like, is profound.

That this is the case is surprising, for parents do have problems, and they do have opinions about how well the schools are responding to those problems. They may feel, for example, that the schools are not competent to respond to the needs of their handicapped children. They may feel that schools do not pick up handicapping conditions soon enough, and that when diagnoses are finally made, they are inadequate or simplistic. They may feel that program offerings are minimal, perhaps even inferior. They may be concerned about the time lost and the risks run in long-distance transportation. Parents have these concerns but they all too often never get expressed in any fruitful way it seems.

However, Cooperatives and LEAs do make efforts to increase involvement, not only because they are legally mandated to do so, but in some cases because they feel a general commitment to the principle. Techniques employed include newsletters, radio and television broadcasts, Child-Find awareness campaigns, slide/tape shows, informational programs, workshops, parent education materials, parent classes, family counseling, and social work activities. As one might guess, the poorer agencies engage in fewer activities than the more wealthy, but all of the five sites studied do engage in at least some of these, with more or less success.

Of special interest are parent advocacy and support groups, and groups constituted to provide decision-making input. Found at all sites is the Association for Retarded Citizens; this group has its own agenda and tends to focus on influencing (lobbying) political bodies, notably state legislatures. Their influence was felt more prior to the passage of P.L. 94-142, and consisted primarily of efforts to get state legislatures to pass laws paralleling (the impending) P.L. 94-142. Locally significant groups are much rarer. Riverhill does have a Parent Advisory Board, whose members are appointed by the member LEA boards; this group is largely reactive, however, to proposed policies, does little to initiate new ones and seems to have as its primary function acting as a communications link between the Cooperative and the community. Midland encourages the formation of category specific parent support groups; such groups exist in relation to most of the programs Midland offers. Midland also houses an externally funded parent advocacy group known as "Pilot Parents," through which selected parents are trained to provide information and support of other parents. But of course such an elaborate activity would not be possible without additional funding. Little else is in evidence at the sites; parent support/ advocacy groups are not prominent in these rural Cooperatives.

Involvement in the IEP/staffing process. One would expect the parents of youngsters currently undergoing diagnosis and assignment to be more involved than other parents, and while that is true to some extent, the difference in level of participation is not very noticeable. Estimates of the proportion of parents involved in these processes ranges from 10 to 90 percent; fifty percent is a commonly expressed average figure, and then, it is usually only one of the two parents who attends, virtually always the mother.

There is some evidence to suggest that the extent of parent participation depends on a number of factors: the nature of the particular LEA concerned (whether for example the LEA is active in soliciting parent involvement), the particular handicap which is involved, the severity of the handicap (less participation can be expected from parents of mildly handicapped children), the socio-economic status of the parents (higher SES means higher participation rates), the amount of prior experience the parents have had with "the system," and, finally, the nature of the prior experience, including whether it reached, in the parents' opinion, a satisfactory resolution.

There is much speculation at the sites about the reason why parents participate so infrequently. Some parents, it is said, see the school as the authority; "they know best" and the parents are content to have them make the necessary decisions. Some do not understand the process, and, despite numerous attempts by the Cooperative or LEA to inform them, just miss out. Some feel incompetent--they are "over their heads" and cannot make a useful contribution. The whole approach simply confuses them. Some feel overwhelmed; the sheer number of "experts" involved puts them off. Some simply have emotional reactions--fear, anxiety, guilt, shame, frustration--which effectively prevent them from participating. Some face irresolveable time conflicts--they cannot attend because they must work, say, or handle other familial or household matters that for some reason take precedence. Some will not attend because they lack confidence in the process or fear the stigma that may attach itself to them. A very few do not attend because they believe that non-attendance is the only means at their disposal to express disapproval of the entire approach.

Cooperatives and schools are under special legal pressures to obtain parental involvement in IEP staffing and so make strenuous efforts to do so. Of course, it should be clear that, early on, school personnel often had as many misgivings as did the parents about their participation; apprehension was high because the school personnel also were inexperienced and felt somewhat incompetent, because they feared public embarrassment, and, in the extreme, felt that parental participation might lead to a "take-over." But several years of experience, plus adjustments such as pre-staffing, have removed most of these early concerns. The professionals in these encounters are definitely in charge.

Techniques used include letters, informational brochures that describe the processes to be followed and outline parental rights, parent conferences, and, in Heartland, parent/infant teams and assistance from school social workers, who act as familial advocates and ombudspersons. A variety of informal techniques are also employed: a proactive style among the professionals most responsible, such as the psychologist, in anticipating and dealing with problems; use of board members and members of parent adivsory/advocacy groups to provide information and exert "gentle persuasion;" and a variety of "off-the-record" contacts between teachers and parents. Strenuous efforts are also being made to simplify the IEP process, including the prohibition of arcane technical language in dealing with parents. But it seems clear that none of these techniques, nor all of them together, have produced the level of parental participation contemplated in the structure of P.L. 94-142, and certainly not the level that would be considered desirable from a humanistic point of view.

Due process. All of the sites studied have developed elaborate due process regulations to protect the rights of the child and parents. Parental participation and sign-off is required at every step of the IEP staffing process: before the staff can test or diagnose a youngster, before the IEP staffing session is scheduled, and before the resulting IEP is implemented. If the parents are not themselves a part of the staffing committee, a parental surrogate must be, or the parents must waive their rights to be present. Parents must further be involved in subsequent reviews: the short term (usually twelve week) review, the annual review, and the triennial review. Parents may revoke permissions already given if for any reason they become dissatisfied with the process.

There are, furthermore, extensive guidelines governing the due process hearing, which can be demanded by a parent who feels dissatisfied, or by the LEA or Cooperative in the event that parental cooperation is not forthcoming. These guidelines spell out in great detail such matters as the nature of the notice required, the nature of the hearing, the qualifications of the hearing officer, the timing that must characterize each step, and the available appeal processes--including appeal to the state courts--if the hearing does not come to a satisfactory conclusion. Parents who have a language problem are guaranteed an interpreter. The hearing is set so far as possible to accomodate to the parents' work schedule. Hardly anything is overlooked that would protect the parents' rights and make the hearing a viable process for all parties.

In view of the immense effort that has obviously gone into developing procedures in such detail, it is more than interesting to note that there have been relatively few due process hearing and/or court cases in any of the five sites. Neither the parents nor the school districts involved have often felt sufficiently pressed to take such action; indeed, it seems to be a matter of policy with most districts that the parents' wishes constitute the final guide to what shall be done in a particular case. It is clear that P.L. 94-142 over-regulates in this area, and by that over-regulation reinforces local concerns about being found in non-compliance. The elaborate regulations have been formulated simply for the sake of compliance; certain there are no practical reasons why they would otherwise have emerged.

Question 5: What are the provisions for related services in intermediate agencies? Is there a relationship between general health care and social resources available in rural communities and the extent and quality of special services provided handicapped students?

Most of the programs and services offered by or through the Cooperatives in these five sites might best be described as "self-contained;" every effort is made to provide, directly within each LEA or in neighboring LEAs, all that is required. However, Cooperatives do turn to other agencies for certain purposes, including:

° Referrals. Many community agencies and practitioners are aware of the responsibilities of the schools under P.L. 94-142 and so refer to their attention those cases which they encounter in their normal practice. Such practitioners/agencies include dentists, physicians (although physicians as a group are often looked on with suspicion both by parents and by school personnel), hospitals, social welfare agencies, community health centers, and county and state health agencies.

° Evaluations. More complex handicapping conditions may require evaluations that are beyond the resources of the Cooperative to provide; these are arranged, for a fee, in area hospitals, urban diagnostic centers, and with private practitioners.

° Source of services. Local hospitals are often prevailed upon to provide occupational therapy and physical therapy services as needed; it is the plaint of Cooperative Directors that either they cannot find or cannot fund PT/OT personnel. Several of the sites have relationships with local community colleges to provide services such as para-professional training courses or media services, either for a fee or in-kind payment (e.g., the Cooperative staffs the program for which the institution provides facilities and gives credit).

° Program sites. The Cooperative may lease a site in which to house a program from ARC; or it may arrange with a local hospital to provide tutorial services for students who are hospital-bound in that facility.

° Institutional service provision or placement. More difficult or low incidence handicaps may be served by participating in programs provided by other agencies, or even by placing youngsters in those facilities. Contracts are usually drawn for this purpose, and tuition or fees are involved. Such agencies include facilities for the deaf and blind, for orthopedically handicapped or severely multiply handicapped students, the state university medical center, the state family service center, or (most frequently involving ARC) sheltered workshops and other vocational prgorams.

It might also be noted that in a few instances Cooperatives find themselves in competition with these other agencies, usually when external funds are involved. Then another agency such as ARC or United Cerebral Palsy may elect to develop its own grant proposal in order to offer services which, under more circumscribed funding circumstances, might be left to the Cooperative to provide.

Overall, it seems reasonable to conclude that the services and programs offered through or in conjunction with these other agencies are the equivalent of those available to anyone, whether located in a rural or urban area. Many of these facilities after all are located in urban areas or serve whole states. What is not equivalent is the ease with which these facilities are utilized. The logistics of getting children there and back are difficult. So while quality may be equal, access clearly is not equal. Unfortunately, the use of these distant facilities is often the only choice available.

Question 6: How are service costs allocated to member LEAs?
This question has already been answered as part of Question 3: Organizational/Governance Issues. See above.

Effectiveness and Impact Issues

The order in which the questions posed in this section (see Part 1, pp. 3-4) are answered has been altered somewhat to provide for a more logical flow. Questions 2 and 3 will be dealt with first, followed by a response to Question 1.

Question 2: Describe the perceptions of school personnel, parents, community leadership, and other relevant actors of the costs and benefits of the collaborative arrangement.

The terminology of cost/benefit comparisons does not occur in the everyday language of most school personnel, or of virtually any parents or community members. Cost/benefit issues seem not to be much addressed, regardless whether a person holds a good or bad attitude about the Cooperative or about special education. When cost/benefit issues are touched upon, they are not particularly likely to be dealt with in terms of the Cooperative per se so much as in terms of special education programs. Thus Question 2 is an especially difficult one to answer.

Costs: It is possible to draw inferences about what respondents see as the costs of the cooperative special education program, whether they are school personnel, parents, or community members. In dollar terms, the program is frequently said to "cost a lot," the implication being that it costs so much that second thoughts are beginning to occur to people. It is not unusual to hear the sentiment expressed that "the Coop gets all our money," whether because of assessments made against LEAs that are not fully reimbursed, or because of the flow-through misperception that figured so prominently in the Midland case. A fiscal expert at one site ventured the guess that as costs continue to go up and resources decline, resentment will grow, resulting in a closer look at special education expenditures and possibly a need for more persuasive justifications.

Community members are likely, in addition to the dollar issue, to be seriously concerned in the cost to them of local autonomy. That issue has already been addressed earlier; it weighs heavily on the minds of those who believe that local communities were doing quite well in relation to their special education needs, and that the Cooperative was simply "laid on." They see little or no gain in return for their loss of discretionary action. LEA administrators and Boards share this feeling, and also regret the accompanying loss of some parts of budgetary control.

Teachers see other kinds of costs. Some regret the ease with which a child may be referred and staffed into a special program; that program, they feel, may be used as a crutch by emotionally dependent children, or as a smokescreen for the child not working up to capacity. The well-intentioned efforts to help the child may rather hurt him or her. They feel that they, the regular teachers, have had placed on them an extra and unfair burden; their pupil/teacher ratios were already high enough, they felt, and placing a mainstreamed handicapped child in their class may result in a fiscal weighting but not in a task weighting. Further, some of the special programs undermine the regular curriculum and the regular tescher's authority and responsibility; at issue here are, chiefly, LD programs.

Auditors of Cooperative special education programs thus have no difficulty in tallying a variety of cost factors, not only in dollars but also in social, organizational, and human terms.

Benefits: Benefits are a great deal harder to pin down than are costs; benefits, expected or unexpected, are both hard to detect and, once detected, to assign unequivocally as effects of the program. But again, some claims are made.

Administrators of LEAs are typically pleased with the fact that the Cooperative relieves them of many burdens. They help with the paperwork, they are insurance against findings of non-compliance, they make possible programs that could not otherwise be mounted, and so on--all of the incentives that were listed in an earlier section of this Report. Parents are pleased because the Cooperative often provides services that would not have been available otherwise. The Cooperative programs make it more likely to bring to the child whatever is needed to meet his or her unique needs.

Many of the costs and most of the benefits are intangible--hard even to define and virtualy impossible to measure. Do the benefits justify the costs? Many advocates would claim that they do. It was clearly the belief of the members of the Congress that passed P.L. 94-142, and of the state legislatures that passed parallel legislation in many states, that such would be the case. But the issue is by no means closed. One parent asked, "Isn't it better if you have $10,000 to spend it on ten children rather on on one?" The question implies opportunity costs, opportunities that must be foregone because the resources that would be required for them are committed to special education instead. Of course no one knows just what those foregone opportunities are. It might be appropriate to ask, for example, "Given that P.L. 94-142 and its parallel statutes had never been passed, is there any reason to believe that the resources these bills commit to special education would have been committed to some other socially useful purpose? Would they simply have purchased more entertainment? More nuclear devices?

Question 3: Describe any equity issues involved in the operation of the multi-district unit, such as distance or travel time for different local districts to obtain services, impact of the funding or cost formula utilized, ability of member of non-member districts to obtain equivalent services within a given state.

The "big four". Rurality is characterized by four qualities which interact to place constraints on service delivery and exacerbate problems found even in urban areas. Cooperatives seem to have adapted well to these four "menaces," so that they are not as influential as the uninitiated might imagine--chalk one off to the hard work of Cooperative administrators. But they still have many serious effects.

The big four are distance, travel time, sparcity (low population density), and terrain/climate. Their possible influence on Cooperative operation is immediately evident. Conquering distance can be managed only through the expenditure of time and resources. Travel time detracts from time that might be more productively used for teaching or learning. Sparcity requires the inclusion of large areas to make up for the otherwise low incidence of clients--especially of relatively rare handicapping conditions. Terrian/climate are themselves interactive; up-and-down implies greater distance than dead level; snowy roads take more time to travel than clear roads; cold climate means more engine failure and hence more foul-ups in transportation.

Sparcity is an especially interesting characteristic. Among the five sites studied, only one, Riverhill, is sufficiently small in area that population sparcity is not a significant factor. In the rural portions of the state in which the Foothills agency is located, 20 percent of the population live on 90 percent of the land. The area served by the Foothills agency, five times that of Riverhill, is larger than the entire state of Rhode Island, but is only one-third the size of the area served either by the Midland or Northern Slopes agencies. But Midland serves almost 32,000 students in 42 LEAs and 14 private/parochial schools, while Northern Slopes serves about 5,400 students in 8 LEAs. Indeed, Northern Slopes serves only one student for every square mile of territory--that's sparce! To make matters worse, Northern Slopes is divided into approximately equal halves by a mountain range that is all but impassable in winter. And even Midland and Riverhill, virtually flat territory, have their share of problems when it snows.

How do the big four impinge upon Cooperative operations? In many ways, including:

° inducing a reticence to make most appropriate (in the diagnostic sense) placements--higher weighted programs are usually further away; sending students to them increases both LEA costs and risks to the student.

° reducing teaching/learning time--travel time is directly subtractable from available instructional time. In a few instances it was found that because of the time spent in travel, students were not in the classroom for the minimum time prescribed by state law.

° producing schedule interruptions because of transportation breakdowns, inclement weather, and similar factors.

° delaying delivery of materials, communications, and other items sent "over the road."

° lowering teacher morale because of the hassle of travel logistics.

° hampering, and at times preventing, vital face-to-face communication between parties: teachers, administrators, parents, and so on.

° impeding in-service training.

° inducing a sense of isolation--a problem in personnel retention.

° increasing costs of all services.

° producing otherwise unnecessary time lags in pupil staffings because of the difficulty in getting all relevant parties together.

° increasing the difficulty of recruiting personnel because they do not wish to put up with these problems and conditions.

Detailed reading of the cases will provide many instances of each of these allegations.

LEAs and Cooperatives have not been very successful in developing solutions to big four engendered problems. One solution, especially attractive to very large Cooperatives, is to decentralize, but one must ask whether decentralization of, say, Midland, does anything more than to produce a number of Riverhills? Since Riverhill is also troubled by the big four problems, is anything really gained by decentralization? Another solution is to rely on operation of the program by LEAs, using the Cooperative only as a support unit, as through consultation and technical assistance. But that can work only in area like Foothills where sparcity is sufficiently in check to permit virtually every LEA to operate its own programs. But if that were the case, what incentive would the LEA have to join a Cooperative in the first place? Would not the funds used to support the Cooperative pay for the services that the LEA needs but cannot itself supply, say, tuition to send a multiply handicapped student to a special program elsewhere? (Note that solution is widely in use anyway, even with Cooperatives in place.) Another solution is to rely heavily on itinerancy--keep the student in one place and move the teacher. That is a solution which is feasible only for programs operated largely on a part-time resource room basis; self-contained programs could not be operated that way in any event. Besides, as we have seen, itinerancy produces its own share of intractable problems. Another solution is to put the time-on-bus to good use; that is the approach being explored in the Bus Driver Project at Riverhill. It remains to be seen whether this solution is viable.

Impact of funding/cost formulas. This topic has already been dealt with as part of Question 3: Organizational/Governance Issues. See above.

Ability to obtain equivalent services. As this question was originally posed to the research team, the issue was whether or not, in a given state, members and non-members of Cooperatives (or recipients and non-recipients of Cooperative Services) were able to provide equivalent services to their client groups. Cooperatives were formed largely in order to overcome inequity in service provision; it was presumed that rural LEAs, usually small and often poor, would not, on their own, be able to mount a full service spectrum. And no doubt that presumption is correct. The present study, as it developed, could not, however, provide information that would shed much light on that particular issue. In three states--those in which the Foothills, Midland, and Seaside Cooperatives are located--membership is not voluntary; every rural LEA in the state is mandated to join the Cooperative in whose catchment area it is located. In all three of those states, moreover, the Cooperative has certain other legal responsibilities to carry out which in effect turn them into intermediate or decentralized state departments. In those states there is no possibility of comparison.

The other two states--those in which Riverhill and Northern Slopes are located--membership in a Cooperative is "voluntary," although in each case certain penalities may be associated with not joining; for example, loss of certain funds because the independent LEA may not have the minimum qualifications to make application for reimbursement. The number of LEAs that remain independent is tiny. In the Riverhill case, there is no LEA in the county that is not a member; again, comparisons are impossible (unless the project had chosen to include some other county in the state in which non-members were found; a decision neither logistically or fiscally possible). In the Northern Slopes case, there is one member of the Cooperative that has elected not to receive special education services (although it does participate in other Cooperative programs). It is significant that this LEA is located in the largest town in the area; a unit that apparently felt that it could, entirely with its own resources, provide a program that would at least minimally meet P.L. 94-142 requirements. Maintenance of local autonomy was preferred to a (possibly) improved level of service. Recalling, too, the extreme emphasis in this state on local option, the decision of this one community is not surprising. In this case, there seems to be little doubt that the LEA program is "as good as" that offered through the Cooperative; indeed, the independent LEA services certain Cooperative clients on a tuition basis through its locally established programs.

If we leave this question of member-non-member equality of service, a somewhat more interesting question can be addressed: Do the members of a Cooperative all enjoy equality of service? Other parts of this report have already spoken, even if only by inference, to this question; thus we have seen that:

° Services are not always equally available; availability depended somewhat on the remoteness of the LEA, on its relative wealth, and on the severity of the handicapping conditions presented by its clientele.

° Services are not always equally utilized; utilization depended on such factors as the degree of local pride (an expression of autonomy?), parental preferences for keeping their children "at home," cost disincentives to making the "most appropriate placement" when that placement would send a child out of the home district, and the fact that service demands almost always exceed service supply, resulting in a rationing of services on the basis of locally relevant criteria.

But there are two other issues that deserve some attention. As is often the case, equality of service is determined not only by a variety of more or less practical considerations but also by certain philosophic positions that are taken. Two of these relate to the nature/nurture controversy, and to the question of whether education is a right or a privilege.

The latter principle is very much at issue in Northern Slopes. It seems clear that in that state there is a sharp division of opinion on whether education is a right or a privilege, and it seems apparent that in the legislature, at least, the latter position is ascendant. Bills such as the Exceptional Children's Education Act (ECEA) speak in terms that would suggest that education is a right even for the handicappd, but, when appropriation bills are on the line, that liberal sentiment is supported only to the extent of about 40 percent reimbursement. That would suggest that education is a privilege; a kind of "let the user pay" philosophy. Very much at issue is the state's equalization aid formula, which clearly does not treat land- and income-poor districts equitably.

At the moment of this writing, a case has been brought before the State Supreme Court in which the SEA (joined by 26 LEAs) contends that education is a privilege and not a right, in effect justifying the legislature's stand, while the complainants--the children of 16 other LEAs, reinforced by a lower court decision in their favor--contend the opposite. The decision of the Supreme Court will, more than any other factor, determine whether equitable services will be made available throughout the state. If the decision is unfavorable to the complainants, gross inequity will result which will affect the rural (read: poor) LEAs out of proportion, and of course, affect the handicapped even more inequitably.

It seems clear from this case that under certain circumstances, at least, the possibility of equal treatment hangs as much on a principle as on any organizational feature.

The former of the philosophic positions--the nature/nurture controversy--is best illustrated in the Seaside case. The handicapped in this Cooperative catchment area come largely from poor, non-white populations. Now, when it is proposed that funds and programs be provided that will help these handicapped overcome their problems, a question that immediately arises is this: "Can they be helped?" If one believes that handicapping is mainly the result of nature--genetic failures, say--then the answer to that question is "No." But if one believes that handicapping is as much the result of nurture as anything else, then the answer to that question is, "Of course."

It is clear that the authors of P.L. 94-142 (and of parallel state laws) tend to believe that nurture is heavily implicated, and that intervention programs can be mounted that will overcome many of the environmentally induced problems. But if a local community--and that often includes the personnel who man its schools and agencies--believe that it is nature that makes the difference ("That's just the way those people are!"), they may be legally required to go through the motions of providing interventions and spending the funds allocated for that purpose, but they are neither committed to those goals nor will they pursue them assiduously. Now please note that is not to say that these are inherently prejudiced people, morally and ethically worthy of condemnation; they happen to be the victims of a particular belief which is, one may note, not entirely without its respectable academic champions (e.g., Jensen).

In short, if it is equity in service provision that is sought, one needs to spend some time establishing, first, that education is a right, and second, that education is possible for the handicapped. If a program is established in a community in which one or both of these conditions is not met, then the probability of equitable service will be very low indeed.

Question 1:[1] Assess any evidence on the quality and quantity of services delivered by the Cooperative mechanisms in terms of the major requirements of P.L. 94-142.

---

[1] Question 1 is addressed last since it seems to call for judgments based on the preceding data.

Introduction. Before undertaking assessments of any kind, it is important to note--and to appreciate--that assessments depend on a number of factors to be meaningful. At least four such factors should be borne in mind as this section is read:

1. P.L. 94-142 does not, typically, come into the hands of local implementers directly, but rather through the filter of a state department of education. Moreover, in the filtering process, P.L. 94-142 requirements are intermingled with the requirements written into parallel state laws. It is not uncommon at the Cooperative level to have a respondent comment that "the state department considers that compliance with ECEA (or Regulation 77 or Chapter 300 or whatever) is equivalent to compliance with P.L. 94-142." It is sometimes the case that parallel state laws set more stringent requirements (or more stringent criteria for meeting them) that does P.L. 94-142. Locals, it should be understood, rarely have P.L. 94-142 explicitly in mind; rather they are, from their perspective, meeting state requirements.

2. Both P.L. 94-14 and the parallel state laws are over-regulated. We have noted that locals often live in a "climate of fear," lest they be found in non-compliance. The activities directed at mere compliance (e.g., "compliance paperwork" and establishing an audit or accountability trail) take on such proportions that they seriously detract from the time, energy, and resources available to engage in service delivery. Compliance documentation and service delivery are, in short, in a trade-off situation, and at the moment, the latter suffers from the over-emphasis on the former.

3. The site visits reported in this study, even though spread over a period of 2 years, nevertheless represent simply a "snapshot" of what is otherwise a very dynamic process. There is a time dependency that should not be overlooked. Everything is constantly in a state of change; it has come from somewhere and it is going somewhere on the day (week, year) on which we happened to take a "picture." Then, like the horses in a 1/1000 second snap of a race, every thing is frozen, but that frozen state is not the real state. To make an adequate assessment requires a longitudinal study of greater dimensions that was presently possible. Two pieces of evidence might be cited to demonstrate the importance of this observation. First, respondents were able to move over time in their memories as they were interviewed; the developmental histories they reported (and which are recorded in the cases) show dramatically how dependent everything is on the passage of time. Second, even after only one year, each of the cases would have required an epilog to "bring it up to date," and at times, the epilog would have had to contain information very different from what had been explicitly or implicitly predicted as probably happening.

4. Assessments which might be made, despite all the above caveats, are nevertheless very context-dependent. They cannot and should not be treated as generalizations. We have had many illustrations in these cases (and many in this Report) of contextual factors that play important roles in determining quality and effectiveness; factors such as sparcity, remoteness, nature of the handicapping condition, nature of administrative support, statewide funding structure, and on and on and on, that must be

systematically taken into account. Moreover, all of these factors interact to further complicate the picture. There are so many perturbations that even if one thought that generalizations were possible in principle, practically it would prove impossible to arrive at them.

Further, it should be understood that the present study was neither conceived as an evaluation nor was it ever so portrayed to the participants at the five sites. Sites were not selected to be illustrative of "good" and "poor" Cooperatives, not were data collected to determine whether objectives were met--either those of the Cooperative itself or those implied by P.L. 94-142 and/or parallel state laws. To have taken an evaluation posture would have put the research team in a very different light and probably would have clogged many of the channels which we were otherwise able to pursue. Hence these assessments are ex post facto and based on incomplete data. On the other hand, they may be based on more credible information than might have become available had evaluation been an openly announced purpose of the study.

Quantitative assessment. Very few relevant quantitative data accrued in this research that might be interpreted with respect to the major requirements of P.L. 94-142. One way to deal with this question is to look for the presence or absence of various features; when that is done all are found to be in place to some degree in every site. "All" is interpreted as the following elements which are said to be mandated by P.L. 94-142 (but see #1 above):

° Zero rejection (more of this below).

° Program provision for special populations--all cases regardless of how unusual the handicap are cared for in some way, either by programs offered by the Cooperative, by one of its member LEAs, or under contract with some other service provider.

° Child find mechanisms are in place; in one state, support at the state level has been withdrawn on the assumpton that high-risk handicapped have been identified, and that local child-find mechanisms are in place.

° IEP procedures have been formulated and operationalized at every site.

° Placements are being made in most cases in appropriate (diagnostically) settings; in some instances waivers are sought, or trial placements are made; even in those cases the "non-appropriate" placement often turns out to be quite appropriate, all things considered. The principle of least restrictive environment is honored, and in a few instances, placement of EMH youngsters in multi-categorical rooms actually results in less restrictive settings than would be the case under usual placements in self-contained EMH programs.

° Parental participation is solicited with respect to the diagnosis and placement of children; however, parent participation is limited because of socioeconomic factors and the reluctance of professionals to give up too much ground to parents.

° Protective safeguards (due process) have been developed and are uniformly in place; they are so elaborately constructed in relation to the number of times they are used that overkill can be suspected (part of the compliance "climate of fear" syndrome).

Returning for a moment to the matter of zero rejection, it is certainly the case that not all entitled children are being served, partly because there is a reluctance to identify them unless appropriate programs are already available (recall, for example, the sudden increase in the number of ED children identified in Riverhill once the program had been authorized and set in place), partly because some parents persist in "hiding" their handicapped children, and partly, no doubt, for other reasons that have not come to our attention. Yet the number of unserved or underserved is probably small and becoming smaller.

Qualitative assessment. It is convenient to begin this section with a review of the P.L. 94-142 requirements. There follow some assessments of local commitments to handicapped children and programs, together with some judgments of overall program quality. The section ends with a discussion of the utility of the Cooperative as a mechanism for meeting P.L. 94-142 requirements, as well as some statements about the law itself.

1. Zero rejection. While, as noted above, not all children are being served for one reason or another, it is also the case that those children who are identified and diagnosed as requiring special service receive it. No one is denied service, even thought there may be some question from time to time whether the service that is provided is what is best for the child.

2. Child find. All of the sites have extensive child find programs, but, with the exception of Midland, none are as thorough-going as they might be. Indeed, in the case of Foothills, the state department of education has terminated funding for child find activities, on the assumption that all high-risk children have been identified, and that effective local mechanisms are in place for the identification of future occurring cases. It seems likely that at all sites, some of the early intensiveness to identify children needing service has subsided, possibly for the same reasons. All of the sites have now accumulated a large case load, and the stimulus for finding even more cases has been blunted. Nevertheless, on balance, the judgment that child find activities have succeeded in identifying high-risk children and continue to succeed in identifying new cases seem appropriate. What is needed is continued vigilance to be certain that location and identification activities do not retrogress.

3. IEP development. The development of an IEP for each handicapped child is certainly one of the most important features of P.L. 94-142, and, recognizing that importance, all of the Cooperatives (and their member LEAs) have instituted means for generating them. These means are remarkably similar although they may differ in some peripheral characteristics, as for example, whether the IEP team is formed on an ad hoc or standing basis. The process of IEP development, originally (and correctly) viewed as very time-consuming, had undergone its "shakedown cruise" at

each site; the process has been streamlined and, by the addition of such features as the pre-staffing, made practical. Two problems remain. First, the preparation and subsequent follow-up of IEPs requires an enormous amount of paper-work whose utility is very much in doubt. The paperwork is mainly compliance-oriented, and only secondarily program oriented. Second, insofar as the IEP calls for joint effort between a regular and special teacher for its execution, there is frequently a breakdown so that what ought to be one program becomes, in fact, two rather disconnected programs. The reasons for this breakdown have been extensively discussed in this Report and in the individual cases; solutions are still unknown.

4. Program provision. The judgment of whether or not programs are appropriately provided rests on a number of prior judgments including: the range of program options available, the availability of staff to implement those programs properly, and the smoothness of any collaborative functioning that may be required. On the third point, we have just commented on the fact that the alliance between regular and special teachers is shaky; when programs depend on that alliance they are likely not to be well implemented. On the second point, we have seen that recruitment and retention of appropriate staff is a difficult problem in all of the Cooperatives. Some staff such as physical and occupational therapists are virtually unavailable. In other cases, staff are utilized in circumstances that obviates their (partial) lack of competence, as for example, the use of multi-categorical rooms whose teachers need to be certified in only two of the three categorical areas ordinarily assigned to such rooms. We have seen that staff sometimes teach with certification waivers, and even those who are fully certified may be less experienced that one would like. Thus, a goodly number of provided programs are probably not implemented appropriately because of staff shortcomings.

So far as the programs themselves are concerned, however, a full spectrum of options is not always available at every site. Sometimes options are compromises or the options are not as accessible as one would hope, involving difficulties in transportation, detaching a child from the physical and social world to which he or she is accustomed and which provides a real measure of psychological security, and making it virtually impossible for the parents to be in close touch with the child's service providers. There is, furthermore, a cost factor that operates as a disincentive to exercise the "best" option in all cases.

One aspect of program provision that deserves special comment is the close relationship that exists between special education and vocational education. They are, as it were, constant bedfellows. While there is a great deal of talk about improving the "quality of life" of handicapped citizens, it seems clear that this rhetoric is more than overbalanced by the emphasis on making the handicapped "more productive and contributing members of society," that is, members who will "pay their own way" and not be a "burden to the taxpayer." Employability comes through again and again as a major goal of special education programs; phrases such as talent assessment, career exploration, work adjustment, career education, occupational education, and vocational education are encountered over and over. Now there is no doubt that youngsters ought to be taught how to get and hold a job--all youngsters need that kind of training. They ought also be able to acquire during their school years some skills toward that same end. But the curriculum is overwhelmingly in support of vocational training for these youngsters --one must look far and wide to find any experiences that will help them improve the quality of life. It seems clear that this society's economic orientation holds as much sway in this arena as elsewhere; humaneness is largely lacking.

5. Appropriate placement. All of the Cooperatives attempt through the IEP process to develop a "diagnostically appropriate" placement for each child, that is, placement in a program that will maximize educational opportunity in terms of what is possible for that handicapping condition. A range of program options available for placement at each site makes it possible to assign the child to one that is nominally, at least, appropriate. "Common" conditions such as ED, LD, and EMH usually are assignable to programs within the home LEA or one close by; less common handicaps such as TMH or SMH usually require transport to a more distance facility.

But the availability of programs is no guarantee of their effectiveness. A number of problems may arise. First, the program available for a particular child, ED say, may be marginal, because it may be taught by unqualified staff on certification waiver, because the curricula and materials supporting it are inadequate, or because the facilities are minimal. It is unlikely that any of the programs at any of the sites is as good as it could be made under ideal conditions. Fortunately, most of the programs are at least minimally adequate, and a goodly number are quite good. Another problem that may arise is that, because of lack of fiscal resources or qualified staff, or, because of a lack of a program at all, a child may be assigned to a multi-categorical room, where numbers of children can be taught at once, thereby reducing per pupil costs, and to which a teacher not certified in all areas can be legally assigned. While there may be some advantages in such rooms, as for example, that EMH youngsters come into contact with other kinds of children than they would in the self-contained room to which they would usually be assigned, it would be difficult to claim that on balance multi-categorical programs are superior, in terms of equalizing educational opportunity, to programs targeted specifically on some particular handicapping conditions. These programs do have benefits as noted, particularly if staffed with a good teacher. The danger with their use is that they can be overused for administrative convienence.

Finally, there is a philosophic question that can be raised about the meaning of the term "appropriate." The term is usually understood as "diagnostically appropriate," but, as is easily seen, what is diagnostically appropriate may not be most appropriate in some more holistic sense of the term. This observation is likely to be especially true in cases in which youngsters are reassigned from their home schools or LEAs to a more diagnostically appropriate setting which happens, unfortunately, to be some distance away. Children are separated from their normal supportive environments, from family and peer group with whom they might otherwise interact throughout the day. The transportation involved uses up time and adds risks to the child's life. Parents are less able to stay in touch with what is happening to their children and to be able to influence the service that is provided. The child may be moved into a community which is socially and even culturally different. Thus, what is most appropriate from a diagnostic point of view may not be appropriate in some broader sense; the child may actually be constrained rather than freed.

Now the number of children for whom the most appropriate diagnostic placement is away from home is, in overall terms, rather small--a small proportion of the handicapped population which in turn is a small proportion of the total population of children. Nevertheless for those children the most appropriate placement may be a traumatic one indeed. It seems appropriate to suggest that placement policies ought to be reviewed with this fact in mind.

6. Least restrictive environments. By least restrictive environment is usually meant an environment as much like the "normal" classroom as possible, an environment in which a child encounters many "normal" models. Presumably such encounters will improve the child's self-image and social competence, and may even improve academic performance. (Unfortunately the evidence for any of these contentions is far from conclusive, but these allegations are widely believed.) But as in the case of "most appropriate placement," what constitutes a "least restrictive environment" is open to interpretation. We have already noted that for an EMH child, cutomarily placed in a self-contained class, placement in a multi-categorical room with ED and LD youngsters may be tantamount to making his or her environment less restrictive. But other questions of a more pervasive interest may be raised.

The most usual interpretation placed on least restrictive environment is what has come to be called "mainstreaming." Here the child is placed into a regular classroom; he or she may be given supplementary assistance by the regular teacher (who may be advised in this matter by a consultant or resource teacher), or, more usually, may be taken out of the classroom into a resource room for brief periods of supplemental teaching by a resource teacher. At least, that is the model. But we may note, first, that some children are placed into regular classrooms who perhaps ought not to be there simply for the sake of compliance with the least restrictive mandate; that is, as evidence of the fact that the school is "doing its best" to comply. This practice may have the most serious consequences for the child; far from being normalizing and stimulating, it creates for him or her a no-win situation.

We may also note that the resource room model doesn't work all that well either. Pulling a child out of a regular classroom has a variety of possibly undesirable consequences: it creates program discontinuities for the child, results in a loss of at least some regular teaching (and thus puts the mainstreamed child further behind his or her regular classmates), and it brands the child as "special," a stigma which classmates are all too likely to exploit. Of course both regular and special teachers are aware of these possible consequences and do what they can to overcome them through, for example, careful scheduling and "awareness" programming. Yet some negative side effects seem to be inevitable.

7. *Parent participation*. The record of parent participation is not shiny at most of the sites, at least so far as participation in the IEP process is concerned. We see that typically only about half the IEP staffings have a parent in attendance, and then it is likely to be only the mother who is there. Some parents *cannot* attend, for example, because of work or other schedule conflicts, and some *will not* attend because they lack faith in the system or as a form of passive resistance signifying disapproval.

The experience of Midland does seem to indicate that parents who are committed to education and who have available to them a variety of excellent facilities will participate in program *implementation* to a greater extent than in IEP staffing. This observation seems to be especially true of the parents with children in the pre-school program. Since the other Cooperatives lack such programs, no comparisons are possible.

Two other comments seem appropriate to a qualitative review of these Cooperatives and their contexts. First, one may be moved to ask the question, "To what extent are the communities involved really committed to providing P.L. 94-142 type benefits to handicapped children?" It seems apparent from these five cases that there is a great deal of variation. In Midland, we find persons who are culturally committed to education, who would do virtually anything to improve it. They demonstrate that commitment over and over, in terms of the school system built throughout the state, which is one of the finest in the nation (as scores on national tests prove again and again), and in terms of the taxes they voluntarily levy on themselves. The parallel state legislation passed prior to P.L. 94-142 provided so much support for special education that when P.L. 94-142 funds became available, they could be used virtually in their entirety for the support of a pre-school program --everything else was already covered. Because these people have that commitment, and back it with their dollars, they have evolved a special education system perhaps unparalleled anywhere in the country. Other sites appear to be considerably less committed. At Northern Slopes, for exampl, where, on a statewide basis, education is viewed as a privilege and not a right (and hence the user is expected to pay). While no one would argue that Northern Slopes does not offer programs that at least minimally meet the requirements of P.L. 94-142, they have a long, long way to go to match what happens in Midland. Parents who had a handicapped child and the option to move to wherever they wished to live would certainly select Midland as the state of choice.

Second, one is moved to ask, "What is the overall quality of these programs?" If the question is intended to ask whether the programs are of the high quality we have a right to expect, the answer is, "Yes, in terms of the resources that are put into them." But if the question is intended to ask whether the programs are as good as they might be, the answer is, "Clearly not." Now of course one can always establish ideals that are not attainable under any circumstances, indeed, it is the nature of ideals that they be unattainable. But we are not speaking here of ideals, only of "being as good as one can." And on that criterion all of the programs, including Midland, have a considerable way to go.

It is important to note, however, that the power to become better is not vested in local hands, except in part. Of course more resources are needed, and the difference between Midland and the other sites makes it clear what a difference resources can make. But there are other problems of equal magnitude: the lack of properly trained personnel in both regular and special teacher categories (a matter more in the hands of teacher training institutions than local sites), the lack of appropriate materials (a matter more in the hands of developmental projects and publishers), the lack of appropriate facilities (partly a matter of resources but also of lack of knowledge about what kinds of facilities are most productive of educational accomplishment), and so on. Interventions directed at any one of these factors will not make a sufficient difference; a concerted wholistic approach is needed.

Finally, we may turn to some other observations about P.L. 94-142 and the utility of the Cooperative in meeting its requirements. First, let it be noted that P.L. 94-142 mandates a presently unachieveable model of service delivery; that is, it lays over the current (older) system some requirements for which that system is simply not ready. The new mandates define new roles. Regular teachers must now deal with mainstreamed youngsters, and interact with special teachers as consultants or resource personnel in dealing with them. Special education teachers must be prepared to take on those consultant/resource person roles from their end. School principals and LEA superintendents must provide the leadership and support that these new roles require. All of these people must, further, work together with other kinds of personnel in and out of school in what closely approximates an interdisciplinary team. And none of these persons is relieved of any of the expectations associated with their former roles: regular teachers still have roomsful of children to teach, special teachers still engage in instruction of youngsters with special needs, principals and superintendents have all the administrative functions they have always had, and so on and on. New roles and extended roles abound, and nowhere is there any modicum of relief from the demands of the old roles!

Nor are these personnel trained to these new roles. Certainly those who have been out of their pre-service training programs for five or more years were not exposed to these new ideas, but, although it is shameful to admit it, even recent graduates have had no training as schools of education continue to ignore the new responsibility and to train persons only for the old.

And finally, with all of its mandates to meet, P.L. 94-142 is also overregulated. The hand of compliance lies heavily on the shoulders of everyone associated with the "new" special education. Not only are there more and new things to be done by people poorly trained to do them, but much of their time and energy must go into maintaining documentation trails for the sake of compliance reports.

Given all of these factors, is it any wonder that the system is buckling just a bit? And is it any wonder that in rural areas, in which any problem is magnified and excerbated by rural conditions, the system should be buckling even more?

The Cooperative has proved to be the only viable way in which P.L. 94-142 could be responded to by these small, rural LEAs. Begun in order to enable even such a minimal response, and to ameliorate inequities of resources and service provision, the Cooperatives have been more successful than probably would have been thought possible, in prospect. They have proved to have a multiplier effect--involving individuals and agencies beyond the own membership and focusing their resources as well as their own on the needs of handicapped youngsters. They have set up synergisms, between special education programs and other kinds of services offered (academic, media, library, and so on), and between special education programs and outside funded projects (research, development, demonstration) that have yielded increased dollars, extended facilities, improved ideas, as well as an energized and excited staff. They have better utilized personnel, enabling the use of more specialized persons whose expertise could be more narrowly focused on significant problems. All in all, of the best Cooperatives, one could say--as the writer of the Midland case said of that agency--that they are impressive units, and that they would be thought of as impressive even if they were located in Chicago! Indeed, there is considerable doubt whether Chicago --or any large urban area--provides the conditions that would make a Midland possible.

Cooperatives were expected to be most useful to small LEAs, and they have proven so to be. At several sites larger LEAs abstained from Cooperative membership because they had ample resources to maintain independent special education programs. One may reasonably presume that any school district that has the requisite resources would prefer, in the interest of maintaining its precious local autonomy, to operate its own program; in the case of Midland we noted that the largest 22 cities in the state, currently forced to be Cooperative members, were vigorously lobbying to have that requirement removed. But for the small, and especially the small and poor, LEAs, Cooperatives have become the mode of choice: to guarantee a minimally acceptable program, to share risks and paperwork, to form an effective lobbying and entrepreneurial group, and, lest we forget, to provide a better level of service to handicapped children.

Finally, the history of these five Cooperatives provides important evidence of the positive impact of P.L. 94-142. Even though many locals are not fully cognizant of that law, being oriented primarily to a parallel state bill, it should not be forgotten that many of those parallel laws were passed in anticipation of P.L. 94-142; a case of "willing the mandatory," as it were. Nevertheless that act of *a priori* willing had positive effects: it gave the state a sense of ownership in its own program and hence a greater sense of commitment; it provided an earlier base from which to grow, and in some cases, whether in a competitive spirit of "going the extra mile" or for some other reason, culminated in legislation that actually exceeded P.L. 94-142 in scope. The imminence of P.L. 94-142 both stimulated local legislatures to pass their own legislation (one might think of it as a kind of latter-day "soonerism") as well as reaffirmed to everyone the principles on which it was to be based. Everyone had to take the whole thing more seriously! And when P.L. 94-142 was passed, the effect was to push up levels of effort everywhere, and to counter opponents who had begun to find their collective voices following the passage of local legislation.

It should not escape our notice that P.L. 94-142 also provided some new funds for special education. These funds have not been as large as one might have expected from a reading of the purposes announced in the preamble to P.L. 94-142, but while marginal, the funds have made possible some efforts not possible before. They have also acted as a kind of national equalization force; no doubt that effect will continue to become of greater significance if the national economic downturn continues.

P.L. 94-142 has also had the effect of fueling what has become a kind of self-sustaining reaction. The case history of Midland is instructive in demonstrating that "services beget services." If it becomes possible to provide services in some areas that are not available in others (as was the case in Midland's state when Superintendents acquired the time and resources to establish special education programs in selected communities), the inequity becomes patent to all; the "victims" quickly demand equal services. To whatever extent P.L. 94-142 is successful in establishing effective programs in some locales or some states, other locales and other states will clamor for equal programming. P.L. 94-142 is thus a powerful catalyst for change.

PART V

GENERALITY OF FINDINGS

Part V is included in this report because it is mandated in the RFP. But It is the posture of the researchers that this section is not germane to the study as done, nor can the study fruitfully yield "generalizations" in the sense of nomic universals, unrestricted as to time and space.

We have seen in Chapters I and II that generalizability is an assumption that characterizes the conventional research paradigm, and that the naturalistic paradigm not only rejects this view but makes the exact oppostive assumption: that at best, only transferable elements may be abstracted whose transferability is an empirical matter, depending on the degree of similarity between sending and receiving contexts. In the classical paradigm, all that is necessary to insure transferability is to know something with high internal validity about Context A, and to know that A is somehow representative of the population to which the generalization is to apply. It will then apply to all contexts within that same population.

The naturalist rejects this formulation on several grounds. First, the concept of "population" is itself suspect; it identifies a group of persons, agencies, places, or other units that can by definition be placed together, as for example, the population of Chicago residents, or the population of mentally handicapped, or the population of rural cooperatives. Now as every sampling statistician knows, inferences about populations can be made with greater and greater precision to the extent to which the population is divided into homogeneous strata: the portion of Chicago residents who live along the North Shore and who earn $75,000-85,000 per annum; the portion of the mentally handicapped who fall in the IQ range of 65-75; the portion of cooperatives that have been formed under voluntary state legislation in rich states with strong committment to education; and so on. The more homogeneous the strata can be made, the better the inference. But of course what such stratification amounts to is the formation of subunits that are more and more alike contextually. If one wishes to know, under those circumstances, whether something found out about a stratum of Chicago residents also applies to a stratum of, say, New York residents, the two sub-populations will have to be compared on those factors that define the stratum. That is to say, in order to be sure of one's inference, one will need to know about both sending and receiving contexts. We move then from a question of generalizability to a question of transferability. And transferable inferences can be made only by someone who knows both the sending and receiving contexts; they cannot be made by a researcher who knows only the sending context. The latter can develop only working hypotheses about the contexts he or she did study; in effect, such hypotheses make up Part IV--Results of this volume.

An illustration of the above allegations can be formed by considering a few of those working hypotheses, for example, "The Big Four pose some real problems in rural settings, " or Parents are apathetic," or "Fiscal disincentives exist that tend toward the creation of multi-categorical rooms." Suppose now one wishes to suggest that those same hypotheses hold in some other rural cooperative. First, we should notice that these working hypotheses were not equally true, nor true in the same way, of the five sites studied; hence they are not likely to be equally true or true in the same way in any other site. Further, by looking at the particulars of the cases, we begin to develop some insight into how the Big Four exacerbates the problems in Northern Slopes--because (primarily) of mountainous terrain, or in Seaside--because (primarily) of water barriers; why parents are apathetic in Seaside (nature/nurture controversy) and in Northern Slopes (right/privilege controversy); why fiscal exigencies tend toward the creation of multi-categorical rooms in Foothills (distances and terrain) and in Heartland (startup and withdrawal risks). The "generalizations" are meaningless without information about their genesis, development, and prognosis indigenous to each particular site.

Finally, it should be clear from the above that if there is to be any generalization (and we much prefer the term "transferability"), the burden lies not with the researcher but with the person seeking to make the application. The researcher cannot know the sites to which transferability might be sought, but the seekers can and do. The best advice to give to anyone contemplating such a transfer is, first, look to the case that most closely approximates your own contextual circumstances; second, be sure that there is sufficient overlap of conditions between the sites to make the transferability hypothesis feasible, and finally, conduct some additional pilot tests to be certain of your inferences before you attempt replications or make major investments.

PART VI

CONCLUSIONS AND POLICY RECOMMENDATIONS

It is difficult to know how to construct a section of a report that ostensibly deals with policy. One issue is simply this: to whom do you address policy recommendations? Who are the policy makers in this instance: the Congress, state legislatures, the Office of Special Education in the Department of Education, state education agencies, Cooperative and LEA boards? Obviously all are policy makers in some sense and at some levels, but it would be impossible to structure this section so that discrete sets of policy statements could be directed at each. Responsibility for policy making overlaps; moreover, the implementers of policy made at a superordinate level become the makers of policy for implementers at subordinate levels. Our solution to this dilemma: hope that each kind of policy making audience will recognize those recommendations that apply to it, in whole or in part, and will take appropriate action.

Another issue has to do with the nature of policy statements. What is a policy anyway? A guide to discretionary action? Governing guidelines? Mandates? Standing rules? Our solution to this dilemma: avoid making a definition of policy since to make one would be to invite differences of opinion that would obscure the meaning of what was said and divert attention from it. Instead, permit each reader his or her own definition, and although that will mean some confusion in interpretation, that confusion is less offensive than complete diversion.

A third issue has to do with whether recommendations should be directive or simply suggestive. Our solution to that problem: don't over-estimate you own importance. The research staff is in no position to mandate anything; we can only hope to be persuasive by dint of strong and well-docummented argument.

A final issue has to do with the form of the recommendations. It was discovered that different formats for policy statements emerged from the cases. Sometimes the statement took the form of a caveat: things to remember or watch out for while policy was being formulated. At other times the statement pinpointed some need for which a particular policy might be ameliorative. At still other times the statement involved a trade-off: having done this you have reaped that, or, if you do this you cannot also do that. Our solution to this problem: put in all three, organized into just those three sections: caveats, needs, and trade-offs.

Caveats

In formulating, reconsidering, and reformulating policies, policy makers ought to be mindful of the following caveats, all of which have emerged from one or more of the studied sites:

1. Policy changes are the keys to solving many problems noted at the sites, but all levels of policy makers and implementers must act in a concerted manner if mandated policies are to achieve their purposes.

There is little point in setting a policy which lower level policy makers will find repugnant or to which they cannot conform because of problems of resources, staff availability, local culture, and the like. As changes in the policies governing P.L. 94-142 are contemplated, it is imperative to obtain and honor imputs from all levels to avoid pitfalls and to provide them all with a sense of ownership and, hence, of commitment.

2. Policy-in-intention and policy-in-implementation are not the same. There is always a noticeable difference between a policy statement and the way that it is, or can be, carried out. First, the intention of a policy is usually difficult to divine. When the policy is made in the Congress or a state legislature, the policy may be left deliberately ambiguous in order to retain as many constituents as possible. Agencies charged to develop guidelines may be reluctant to make statements that might be interpreted as coopting the legislative body, or imputing to them intents other than those they "really" had. When the policy is implemented, resources of time, energy, and money almost always fall short of what is required to carry out "full" intent; local policy implementers cut corners, ration services, and make their own interpretations in order to fit the ends to the means. And that even from the well intentioned implementers, those street-level bureacrats, as Lipsky (1980) has termed them.

3. Thus, while laws propose, humans dispose; policy makers must legislate for reality, not for an ideal. We have seen that P.L. 94-142 imposes a burden on the present system for which that system is not quite ready. Yet compliance with the mandates is stringently enforced. The result: a climate of fear which, like all anxieties, debilitates and constrains performance. Policy makers need to take account of the real conditions and circumstances under which the policies will be carried out.

4. Furthermore, while mandates are frequent, guidance is rare. P.L. 94-142 is notorious for "laying on" mandates while failing to specify how those mandates might feasibly be carried out. It is now evident, as it should have been all along, the local agencies do not possess the expertise to do what they are ordered to do. That observation is not a reflection on their intelligence or wisdom, for it is likely that no one, legislator, Federal or state bureaucrat, or university professor, possesses the requisite wisdom and experience. It would be a great relief to all if subsequent laws and policy statements recognized that fact, and made some provision for sharing the responsibility for devising means to achieve the mandated ends. Mechanisms to encourage and enable such joint effort are needed.

5. Policies ought not to be based on the assumption that locals will, in the absence of stringent enforcement measures ("teeth" to assure compliance), fail to carry out their responsibilities. There is some evidence from the past that not all localities can be trusted to "do the right thing." The Federal government has over the past several decades, and in a number of arenas, taken the posture that its special mission in education is to identify and support certain "national imperatives." To be sure, there are national imperatives, but there are also

local demands and possibilities. Policies ought not to be written in ways that close out the latter any more than in ways that enable local closeout of the former. We have seen from these cases that local autonomy is a powerful dynamic; that perhaps the major force acting to constrain Cooperatives is the fear that locals will be required to give up even more of their decision making power. That fear must be taken into account, and the local desire to be a full partner must be honored.

6. *Policies ought not to be based on the assumption that compliance is equivalent to quality*. We have seen from these cases that monitoring is primarily a "check-off" process; whether a child-find program is in operation is more important than whether it is turning up the appropriate youngsters; whether there *is* an IEP is more appropriate than what it says; and so on. Now the research team suspect that monitoring has devolved into a kind of "deliverables" listing precisely because no one knows that quality would mean and what its indicators are. But the need to save face is rampant; everyone pretends that he or she *does* know, and that when these check-offs occur, quality can be assumed to have been checked also. But this tendency can be shortcircuited *if* policy statements clearly separate the issues of presence and quality, and propose criteria for the latter. If criteria are *not* known, there should be no pretence that anything else is being checked than presence.

7. *Policies should emphasize remedies and not penalties*. The language of "mandate" and "compliance" is rampant at all the sites; it is as though a local agency could have only one reason for failure to comply, and that is willful disobedience. "By God," the policies seem to say, "They *will* comply or we'll have their heads." The result is that when mistakes are made, or shortcomings occur, one's every instinct is to *hide* them and hope they won't be noticed when the compliance check is made. But it should be clear by this time that not nearly enough is known, about *either* proper ends or means, to support so dogmatic an attitude. A policy that openly recognized the high probability of failures and mistakes, and afforded means to redress them, would ultimately be of much greater significance than one that promised merely to punish.

8. *Finally, it should be evident that legal mandates aren't enough; there must also be local commitment*. What we have here is a case of the classic, "You can lead a horse to water . . . ." These cases have illustrated not only variability in commitment from site to site, but have dramatized the powerful role played by local history, experience and political culture. Clearly no mandate is likely to overcome such fundamental differences quickly. What we face here is a long-term problem that will have to be worked at over a period of generations. That progress has been made cannot be doubted; P.L. 94-142 is itself a powerful testament in favor of that assertion. But patience will serve us all better at this point than anger; understanding better than intemperance; a helping hand better than a heavy hand. To those whose children are adversely affected by the history of political culture it is a bitter pill to swallow, and policy-makers must surely do all they can to limit their torment. But a supportive political culture takes time to build; what we should be doing is laying plans for building it rather than railing against the incomprehensible slowness of the process.

Needs

Needs are shortfalls which policymakers could compensate if they chose to do so. Of course they must balance those needs relating to P.L. 94-142 against other kinds of needs for which they must also provide resources and support; the decisions involved are, in the final analysis, a matter of values. There is nothing "natural," inherent, or compelling about the following list of needs; it does represent, however, what those most intimately involved with the implementation of P.L. 94-142 in rural Cooperative settings believe to be crucial to their continuing and expanding successful operation.

1. Clarify and simplify P.L. 94-142. Some of this confusion arises from the fact, already noted, that major bills are always deliberately ambiguous in order to retain constituents. Another factor in this case is that even professionals in the field of special education do not agree on terminology and basis therapeutic concepts. Still another is the fact that any bill, no matter how carefully written, is subject to a variety of interpretations; the recent Supreme Court decision in the case of Rowley is illustrative of the fact that even these honorable gentlemen could not agree on interpreting the bill's provisions--a strong minority report was filed.

2. Provide more resources. A major stated purpose of P.L. 94-142 is to assist the states fiscally to carry out its provisions. Some funds have been provided, but not in proportion to the mandates that were laid on. The absolute level of funds available to do the job--even in states like that of Midland--is too low. Of course every program always is found to need more funds; no doubt careful examination by the Cooperatives might identify ways in which existing resources could be better allocated. But there can be no doubt that more dollars are needed if the P.L. 94-142 programs are to move to the next plateau of effectiveness.

3. Provide more resources, proportionately, to rural areas. Everything costs more in the country: services are more expensive to provide, as we have seen; human resources are not in place, and incentives are required to ameliorate that problem; perquisites are needed to offset the rural disadvantage; even more training than one might expect is needed because of the relative youth and inexperience of those persons who are recruited; and so on. It is a truism in business that volume gives one a competitive edge, but with rural cooperatives, it is expected that they compete equally in the face of sparseness. Special subsidies are required to restore their competitive ability. Some sort of "rural weight" should be developed along the lines that provides LEAs extra funds for handicapped students in proportion to the degree of severity.

4. Fully fund mandated programs. It simply adds insult to injury when mandated programs are not fully funded. In most states special education expenditures are not fully reimbursed--the injury. But when the authorized reimbursement is not provided, the insult follows. Among these five cases only one state failed to carry out its responsibility, but even that one case should not be tolerated.

5. Build in the state as a major actor. We have seen that it is the parallel state law rather than P.L. 94-142 which most locals have in mind when they think of compliance. We have seen that it is SEA personnel who monitor, and that Directors of Cooperatives consider the SEA to be an integral and vital part of their political "beats." In short, Cooperatives attend to the state and are only rarely cognizant of Federal involvement. The SEA thus provides a "natural" channel through which Cooperatives can be influenced. Any revisions or extensions of P.L. 94-142 should contemplate designating the SEA as a chief actor in a more formal way, to exploit that channel.

6. Stimulate the redesign of state equalization/funding formulas. We have seen that often equalization is not very equal; rural LEAs and Cooperatives continue to however near the "poor" end of the continuum. New formulas are desperately needed. The Midland example of a common tax base plus an equalization increment is probably a good model to follow--at least from a special education perspective. Further, services should not be reimbursed on a head-count basis, for in general, some minimum level of service must be provided regardless of the absolute number of clients being served; thus, service costs do not rise or fall in proportion to headcount but remain more or less constant. And, no account is typically taken of extraordinary start-up costs. Finally, state economic dilemmas ought not to be solved by "juggling" elements of the formula (the example in Midland's state of altering the formula from a base of average per pupil expenditures to lowest per pupil expenditures is a case in point). To do so renders planning moot and balances budgets on the backs, in this case, of handicapped children.

7. Provide assistance in carrying out legislated mandates. We have seen that mandates are frequent but guidance is rare. LEAs and Cooperatives need assistance in knowing how best to respond to the requirements of the law. Providing for technical assistance, from the SEA, a consultant corps, or even from private advisors, is essential if performance is to improve. At the very least some means of sharing successful experience from site to site should be devised.

8. Allow for more flexibility and variation at the local level. We have seen that a strict application of existing mandates does not always prove to be most usefully responsive to local conditions. Furthermore, locals need and want more local option; to preserve their feelings of self-esteem, and to foster "buying into" the program, local autonomy needs to be recognized and honored. In more technical language, what is needed is a policy more idiographically and less nomothetically oriented.

9. Reduce the existing "climate of fear". We have seen that the present emphasis on compliance wreaks havoc with effective program operation. Almost as much time is spent by some persons on compliance activities and compliance paperwork as on service delivery. Almost everyone agrees that P.L. 94-142 and its local parallel laws are overregulated. Local integrity needs to be more openly recognized; emphasis must be shifted from compliance to quality; guidelines and regulations need to be reduced in number and simplified in the bargain.

10. Provide personnel incentives. We have seen that a particular problem of rural Cooperatives and LEAs is their inability to attract and retain professional personnel. There are surely many disincentives to their recruitment and retention. These disincentives can in part be offset by providing differential salary schedules and other perquisites; the example of Midland is a case in point. Of course all these things cost money; again, it may be possible to provide for them through a reimbursement "weight" for personnel in rural areas.

11. Provide increased pre-service and in-service opportunities. We have seen that a major impediment to the effective and efficient operation of the system mandated by P.L. 94-142 is the fact that personnel have not been and are not being trained for the "new" roles called for, whether regular or special teachers or administrators. Efforts have been made in the past to influence pre-service education, as for example, through the "Dean's Grants Projects," but these have been notoriously unsuccessful. In-service training is particularly difficult in rural areas because of the accessibility problem; moreover, regular teachers thus far have failed to see a real need for re-education. It is imperative that close attention be given to this problem and new mechanisms and programs be devised that counter the problems of the old and provide both institutional and individual incentives.

12. Stimulate the development of additional, optional, models of service delivery. The mandates of P.L. 94-142 not only lay on the present system tasks of which the present system is incapable, but in fact lay them on in monolithic fashion. It is a philosophic presupposition of this research that context is all-important, and surely the five cases bear this point out well. We see that many local parameters can enter into the mix as "mutual shapers": history, funding pattern, tradition, state law, local attitudes, feelings of autonomy, relative experience of personnel, degree of previous success experiences, and on and on and on. Some attention should be given to the development of alternative models among which a particular local Cooperative might choose, that reflect different possible permutations of such factors and allow a greater degree of individualization on the organizational level. It is a truism of teachers that they must begin where the pupils are; similarly, policies must start where the institutions are.

Trade-Offs

Virtually all policies imply some trade-offs; these trade-offs need to be kept in mind, and weighed, as part of the policy decision process. Trade-offs provide policy makers with decision options: if they do X then they cannot also do Y, or if they do X they necessarily also buy into Y. In this less than perfect world virtually nothing is free ("there is no free lunch"); everything bears its price. The trade-offs listed below expose some costs that are often overlooked.

1. IF: You insist on complete conformity in meeting national imperatives such as those idealized in P.L. 94-142;

   THEN: You decrease the implementer's ability to respond to local setting demands.

That is to say, national imperatives and local needs are often at cross purposes. Now of course if those local needs are illegal or inhumane, it is right to emphasize, indeed, to insist on, national imperatives. But most are not, and if these local needs cannot be met, hostility, non-conformity, and outright resistance may result. A balanced posture is well-advised.

2. IF: You provide for maximum authority and responsibility to be vested in the Cooperative;

   THEN: You correspondingly diminish the authority and responsibility of the member LEAs.

Given the concern over autonomy that has been encountered in these five cases, it is useful to think about setting the stage in ways that will permit the LEAs to retain some measure of authority and responsibility.

3. IF: You reduce the amount of compliance activity (mainly paperwork) from the presently required level;

   THEN: You will increase the probability that more effort and energy will be expended on service delivery.

It is the case, as we have seen, that a great deal of time and effort are expended in activities that relate to the demonstration and documentation of compliance. Clearly time and energy devoted to such activities cannot also be devoted to service delivery. One cannot be sure, of course, that if compliance activity were to be reduced, the saved time and energy would be applied to improving service delivery, but at least that possibility is opened. The risk involved is that not only compliance documentation activity but compliance itself will diminish. We judge that to be a rather low probability occurrence, however.

4. IF: You mandate compliance with rigid specifications;

   THEN: You inhibit the adapativeness, creativity, and responsiveness needed to educate handicapped children most appropriately.

Rigid specifications are spawned by distrust and by the desire to eliminate ineffectiveness and inefficiency. If the process can be specified down to its last detail, the system becomes "foolproof"; any agent can carry it out flawlessly. But this kind of perfection suffers from a most serious deficiency: it is completely non-adaptable. Any deviation from expectation (and the real world flourishes on such deviations) cannot be handled; the infamous "Catch-22" is an almost certain outcome. Ironically, the more detailed the specifications, the greater the probability of overall program failure.

5. IF: You impose a complex model of service delivery;

   THEN: You may inhibit the ability of LEAs and Cooperatives to carry it out.

We have seen that the requirements laid on by P.L. 94-142 are too advanced to be carried out by the educational system in its present state. Dealing with this problem also involves "starting where the pupil is." Asking for a small step constitutes a challenge; asking for a large step results in frustration and withdrawal.

6. IF: You mandate Cooperatives to insure equality of service;

   THEN: You may reduce the efficiency of its operation.

Equality is no doubt a worthy goal, but it cannot be reached by mandate alone. Equality implies treating everyone equally, but, in the case of handicapped youngsters, unequal treatment is often called for, depending on the circumstances of the case. Insistence on "mere" equality insures bureaucratic nonadaptability of the worst kind. Clearly there must be safeguards against nonequality on irrelevant grounds, such as racial or socioeconomic bias. But such safeguards can be mounted without completely stultifying the ability of local professionals to use their best judgment.

7. IF: You require the Cooperative to operate in such a way as to produce stability over time;

   THEN: You will also reduce the equity with which its services are rendered.

Not enough is known about handicapped children and how to serve them, especially in rural areas, to require early stabilization of the Cooperative's organizational and operational form. Unless the personnel associated with the Cooperatives are in a position to make adjustments, eventually the system will get sufficiently out of synchronization with local needs as to produce gross inequities. The equity of time A is rarely the equity of time B.

8. IF: You are overly permissive in permitting LEAs and Cooperatives to take any path that seems appropriate to them;

   THEN: You run the risk that there will be a loss in overall program quality.

This trade-off is the inverse of several of those already stated. In the press for adaptability it is easy to overlook the possibility that local agencies will be granted too much freedom and flexibility. Without some guidance at the local level, the overall program will lose cohesiveness and integrity and fail in its overall objectives. A balance is needed.

9. IF: You permit Cooperatives to operate in ways that increase service potential;

   THEN: You run the risk of attracting negative political pressure.

Every operation has its clientele who want and value its services. Now we see from these five cases that some Cooperatives offer a much broader range of programs than do others. Every broadening of program scope is likely to produce some negative criticism. To be sure, the clientele to whom the new service is extended will be supportive, but these new client groups become smaller and smaller with each extension; presumably the more important program elements have already been built it. The old clientele will complain that its resources are being diminished; others will complain that the Cooperative is "empire-building;" still others will complain that resources are being diverted from other programs (non-special education) for dubious purposes; still others will argue that the program additions are "peripheral" and that their educational necessity is questionable. If Cooperatives are to do more; the impact of that expanded program should be carefully assessed.

10. IF: You establish Cooperatives in ways that make them independent of other state structures;

    THEN: You reduce the Cooperatives' political viability and their ability to get things done.

Within a state government system, no one appreciates an agency permitted to operate "outside of channels." We see that these channels are also important to the Cooperative itself, providing avenues for both professional and political communication, avenues of appeal, informal influence networks, pools of resources to be tapped, and the like. Cooperatives such as those in Foothills and Midland are more politically viable--because they perform several functions for the state and are plugged into a state network--than those such as Riverhill--which are established under permissive state legislation to be relatively independent.

11. IF: You establish Cooperatives in ways that are new or novel;

    THEN: You may inhibit the Cooperatives' political viability.

This trade-off is a corollary to #10 above. Cooperatives perforce must relate to other political entities, chief among them being the SEA and the state legislature. If Cooperatives take the form of novel agencies, none of the others will know how to relate to them. Caution becomes the watchword until experience builds up. In the interim, the Cooperatives' political viability is low.

12. IF: You establish Cooperatives in such a way as to mandatorily include large LEAs;

    THEN: You will probably experience less cooperation and more hostility from the larger than the smaller.

This trade-off relates to the local autonomy problem. Now large LEAs are useful to include in Cooperatives because they often have the resources, personnel, and facilities to make a substantial contribution to the Cooperative's program. On the other hand, they also can use those resources to establish perfectly acceptable and viable local programs. To be forced into a Cooperative when one has the means to remain independent is the ultimate indignity, the final affront to local autonomy. It would probably we wise to increase the extent to which larger LEAs can opt in or out of Cooperatives; providing a "safety hatch" is almost a necessity in some instances if the Cooperative is to function effectively.

13. IF: You cater to smaller LEAs as Cooperative members;

    THEN: It is likely that handicapped students will be more accepted and receive more personalized service.

We see from the cases that smallness may be a virtue for certain purposes, not the least of which is the degree of acceptance of and the quality of service for handicapped students. In small communities everyone literally does know everyone else; handicapped children are included. Their peers and ther parents' peers have known them all their lives, and their handicaps are more likely to be seen as "mild" deviations than really handicapping conditions. Teachers know these children too, and know their families; this contextual knowledge plus the warmth that tends to accompany longtime relationships results in more personalized, and probably more humane, service. Cooperatives may need to be reasonably large to function effectively, but to consist of smaller LEAs is a virtue from this perspective.

14. IF: You place a youngster in the "most appropriate" setting from a diagnostic point of view;

    THEN: You run the risk of placing him or her in a setting which is not the most appropriate from a wholistic point of view.

There is more to life than being in the program most specifically designed to deal with your particular handicapping condition. Being taken out of the context of the home community, being removed from peer relationships in which one has most likely been accepted, being placed under the care of individuals who have not known one before the moment of assignment, having to spend long hours in travel--none of these factors is likely to contribute to wholesome adjustment. The child may be better off in the home LEA in a program that is, diagnostically, "second choice." It may even be the case that assignment to such a second choice program may result in a less restrictive environment than might otherwise be the case, as we observed for EMH youngsters assigned to multi-categorical rooms.

* * *

Policy-making will continue to be, as it has been, an art. Good policy-making depends on having good information, but good information is not enough. The listing of needs in this chapter stems from information, but judging those needs against one another and against other needs which policy-makers encounter is, in the final analysis, a matter of values. That values play a key role is perhaps most apparent from the trade-offs listed above--virtually every policy decision confronts the policy-maker with explicit or implicit value choices. Further, the caveats, important as they are, will not, in their observance, make a Solomon of the decision-maker--but he or she can be sure that in their breach will trail disaster. It is a lot to take account of all at once, but whoever promised the policy-maker a rose garden?

References

1. Blaschke, C. Case Study of the Implementation of P.L. 94-142. Washington, D.C.: Education Turnkey Systems, 1979.

2. Brewer, Marilynn B., and Collins, Barry E. Scientific Inquiry and the Social Sciences. San Francisco, CA: Jossey-Bass, 1981.

3. Dexter, Lewis A. Elite and Specialized Interviewing. Evanston, IL: Northwestern University Press, 1970.

4. Douglas, Jack D. Investigative Social Research Beverly Hills, CA: Sage, 1976.

5. Ford, Julienne. Paradigms and Fairy Tales. London: Routledge and Kegan Paul, 1975.

6. Glaser, Nathan, and Strauss, Anselm L. The Discovery of Grounded Theory. Chicago, IL: Aldine, 1968.

7. Guba, Egon G. Toward a Methodology of Naturalistic Inquiry in Educational Evalution. CSE Monograph Series #8, Los Angeles, CA: Center for the Study of Evaluation, UCLA, 1978.

8. Guba, Egon G. Criteria for assessing the trustworthiness of naturalistic inquiries. Educational Communication and Technology Journal, 29, 1981, 75-92.

9. Guba, Egon G., and Lincoln, Yvonna S. Effective Evaluation. San Francisco, CA: Jossey-Bass, 1981.

10. Guba, Egon G., and Lincoln, Yvonna S. Epistemological and methodological bases of naturalistic inquiry. Educational Communication and Technology Journal, 31, 1982, 233-52.

11. Halpern, Edward. Auditing Naturalistic Inquiries: The Development and Application of a Model. Unpublished Doctoral Dissertation, School of Education, Indiana University, 1983.

12. Helge, Doris I. A National Comparative Study Regarding Rural Special Education Delivery Systems Before and After Passage of P.L. 94-142. Murray, KY: Center for Innovation and Development, Murray State University, 1980.

13. Hesse, Mary. Revolutions and Reconstructions in the Philosophy of Science. Bloomington, IN: Indiana University Press, 1980.

14. Kuhn, Thomas S. The Structure of Scientific Revolutions. Chicago, IL: University of Chicago Press, 1962.

15. Lincoln, Yvonna S. Strategies for insuring the dependability (reliability) of naturalistic studies. Paper presented at the joint meeting of the Evaluation Network and the Evaluation Research Society, Austin, Texas, October 3, 1981.

16. Lipsky, Michael, Street-Level Bureaucracy. New York, NY: Russell Sage, 1980.

17. Northwest Regional Educational Laboratory. Interorganizational Arrangements for Collaborative Efforts: Literature Review. Portland, OR: The Laboratory, 1980.

18. Patton, Michael Q. Qualitative Evaluation Methods. Beverly Hills, CA: Sage, 1980.

19. Popper, Karl. The Logic of Scientific Discovery. (2nd English Edition) New York, NY: Harper and Row, 1968. (Original published in German in 1934)

20. Reason, Peter, and Rowan, John. Human Inquiry: A Sourcebook of New Paradigm Research. New York, NY: John Wiley, 1981.

21. Reinharz, Shulamit. On Becoming a Social Scientist. San Francisco, CA: Jossey-Bass, 1979.

22. Schwartz, Peter, and Ogilvy, James. The Emergent Paradigm: Changing Patterns of Thought and Belief. Analytical Report: Values and Lifestyles Program. Menlo Park, CA: SRI International, 1979.

23. Stake, Robert E. Generalizations. Paper presented at the annual meeting of the American Educational Research Association, Boston, MA, April, 1980.

24. Stake, Robert E. The Evaluation of Cities in Schools: A Case Study, in press.

25. Wax, Rosalie. Doing Fieldwork: Warnings and Advice. Chicago, IL: University of Chicago Press, 1971.

APPENDIX A
AUDITOR'S REPORT

AUDITOR'S REPORT
Special Education In Rural America
"A Naturalistic Study of Collaborative Service Delivery"

The primary purpose of this report is to determine the dependability and confirmability of the Special Education in Rural America field study component. The process of inquiry auditing is based on the metaphor of the fiscal auditor whose task is to determine the adequacy of the processes used (dependability) and the outcomes reached (confirmability). I agreed to act as auditor for this project, because I share the belief that disciplined inquiry ought to be open to inspection and verification. As auditor I acted on behalf of a larger readership who in general would not be able to read the extensive documents, data sources, and reports, which are the foundation of this inquiry. The overall purpose of my audit was to verify that:

1) Interpretations and conclusions were grounded in the data and,

2) Inquiry techniques were appropriate to the study.

In order to respond adequately to these purposes I spent nearly three days at the University of Kansas conducting the audit. Prior to this I was sent a copy of the Technical Report on the Study, three letters from project staff outlining or explaining the project, and one general statement document which addressed the purposes of the study. I read these documents prior to my arrival which set the conceptual context for some of what I was to do. The day of my arrival, I met with Thomas Skrtic, Earl Knowlton, and Egon Guba, project staff members, to orient me to the study, the audit process, and to clarify procedures and expectations related to the process of and the final product of this audit report. The next two days were occupied with the audit activities I will now describe.

I began by reading the five case studies and keeping notes to myself on key findings and descriptive data which I wanted to check and verify. Project staff members were available and on call for questions and were gracious in orienting me to their data classification system, which made it very easy to find the original data source for verification. These researchers constructed a sophisticated and diligent system for retrieval of data which is to their credit. It enabled me to quickly and efficiently find the data source I needed and I could then continue with my audit activities. Included in my notes to myself I delineated those documents and specimen records I wished to review. This was the next step in my auditing. I then read and reviewed interview protocols, data category cards, in-house memos, policy statements from each State Education Department, newsletters from four of the states involved, descriptions of programs, copies of legal statements pertinent to special education, fiscal plans, public relations documents, evaluation handbooks from State Education Departments, migrant education statutes and interpretations, related and pertinent court cases and the state plans for implementation of PL 94-142. These documents helped to inform the data on the 3 x 5 data cards and the two researchers' journals I read. Furthermore, they allowed me to understand better the historical descriptive sections of the five case studies. I sampled the categories of data cards in four of the five case studies. I purposely concentrated on four of the five cases since I was thoroughly familiar with the fifth site from other related research in which I have been involved. Since I already had a good background in that instance, I felt that it would be more productive to focus on the other four. I also chose to review the cases in reverse order of their development, because I felt that the researchers would have exercised their skills more adroitly the longer they stayed in the field, so that I would be reading the richer cases first. Actually, each of the cases was well written, well documented, and thorough in addressing the purposes of the inquiry. The categories of data cards I sampled and read from each case study were guided by frequency and distribution criteria. I selected the categories most frequently entered in all cases and usually those categories contained the most entries. This indicated to me the importance of those categories in the minds of the participants of the study. I also checked the data cards with the least amount of entries and any irregular category, looking for sources of tension, conflict, or circumstances out of the ordinary. After reading the case studies themselves and checking back on the data I can safely say that the data were collected systematically, and the analysis and synthesis found in the case studies reflected exactly what was in the raw data records and statements.

I then decided to double check this by reading the original project application to NIE and all related correspondence. I found that the research plan outline matched what the researchers accomplished which attested to their honesty and integrity throughout the project. One of the noticeable characteristics of the five case studies is how close to the data the individual researcher stayed. Next, I reviewed the Halpern dissertation, (1983, Indiana University) on Auditing Naturalistic Inquiries in order to see what the writer described as far as stretching the fiscal auditor metaphor to the arena of educational research. At various times throughout the audit I spoke to the investigators of the project, Skrtic, Knowlton and Guba, to clarify existing statements or records or to pose questions to them about their own style of writing, or decisions they made in the field. They were open, direct, communicative and responsive to me.

Additionally, although it is beyond the scope of the dependability/confirmability audit as normally defined, it was clear to me that the researchers had taken many methodological steps that would shore up the overall credibility of the study, including (but not limited to) the overall member checks (site visit 3), individual member checks following interviews, debriefings with local personnel at the end of each site visit, intra-staff debriefings, and triangulation.

In the final stages of the audit, I concentrated on developing "Suggestions for Consideration" for the final debriefing meeting between the investigators and myself. The investigators and I met to discuss the following suggestions:

A) In each of the case studies there appears a Note to the Reader section. This section would be more helpful to the reader if the style were uniform. I think the reader should also know exactly what each researcher did. For example, a simple listing of numbers of people interviewed, types and numbers of classes observed, etc. would be informative. Quite possibly an overview statement about the five states involved would be useful for the reader in simply understanding the scope and breadth of the project. Furthermore, any statements of an apologetic tone for inquiry processes should be eliminated. This was a disciplined inquiry. Ethnographic research methods (Naturalistic Inquiry) are rich in history, tradition and practice in many disciplines: medicine, law, sociology, anthropology, and psychology for example. If the reader is unaware of this body of literature, it is up to the reader to fill in these gaps not the researchers who conducted the case studies. In addition, the rigors and demands of ethnographic-naturalistic case studies is well documented and can be verified by speaking to those researchers. Let the uninformed reader take on that task her/himself.

B) If it is possible to cut down the length of the case study, I would advise the researcher's to do so without compromising the power, essence, and substance of the cases. One place to cut would be the section on "the referral process for students." This process is already well described in the State Plans. People who work in special education are well acquainted with this referral process. Perhaps a footnote could lead the reader to the already written description. Another area which could be compressed is the demographic description. Whenever possible, I would streamline the demographics to one solid paragraph. Next, the sections on funding formulas, while incredibly informative and dramatically

> demonstrative of the individuality of the regions under study, were lengthy and laborious to read. Is there any way to streamline these sections? Finally, the sections which describe the mechanics of a given regional unit like the L.D. program, the EMR program, and the gifted program could be mentioned in a sentence or two by way of description only. Those persons who work in Special Education are more than acquainted with these terms and programs. Again, a footnote or an appendix describing these terms and programs might better serve the purpose of the study. I realize from my own experience as a case study researcher that I am reluctant to cut anything out of the report and that critical trade-offs are faced when one deletes any part of a descriptive narrative. I am requesting that the researcher's consider this course of action to allow for a more compressed case description without sacrificing substance.

In summary, the audit trail included raw data; samples of data reduction, reconstruction and synthesis; process notes (journals and researcher's note on the case studies); and intentions described in the proposal. After reviewing and verifying this trail I do not hesitate at all to say that the investigators of this research project grounded their interpretations and conclusions in the data and furthermore chose the best possible techniques to do so. In the first meeting with the investigators I questioned each of them about their predispositions and biases. They described for me their interest in special education (two of the researchers teach classes in special education for example) and their degree of interest and commitment to that field presently and in the foreseeable future. I needed to clarify this at the onset to be clear about this bias, which I view as healthy and requisite to conducting in depth case studies over long periods of time. One of the reasons one has to have some strong interest in such endeavors is that the length of time, degree of energy needed to sustain oneself in the field over time (in this case over two years) and the disciplined demands of field work are all encompassing. If you don't love the topic and what you are doing you run the risk of disengaging yourself from the participants under study and therefore run the risk of being untrue to your participants interpretations of what they experience in their given social setting. This is what case study research is about. It is thorough in-depth case studies such as these five cases that a body of descriptive and explanatory data will be constructed. It is a time consuming, reflective, deeply personal mode of inquiry. It requires carefulness in language and style of writing which these researchers eminently displayed. The investigators of this study have conducted and maintained a disciplined inquiry. The data collected verify this rather directly. It is a model of excellent research processes and the substance of the findings are powerful. They are to be commended for so diligent and scholarly an activity.

Valerie J. Janesick

Valerie J. Janesick, PhD
Assistant Professor
Department of Program Development
  and Evaluation
State University of New York at Albany

BEST COPY AVAILABLE

Auditor Background

Valerie Janesick is an experienced ethnographic researcher. She has conducted five major long term case studies. She has served as dissertation director of two long term ethnographic case studies at SUNY Albany (McDermott, 1981 and Licopoli 1983). She is currently directing two dissertation studies using the ethnographic methods of participant observation and interview. She conducted the mini-training workshops on Ethnographic Research Methods of the American Educational Research Association annual meetings in New York, 1982 and Montreal, 1983. She has conducted workshops on this method in the United States and Canada at leading universities. She currently teaches a course in Qualitative Research Methods and has published the results of her research projects in Curriculum Inquiry, Secondary Education Today, Studies in Art Education and other journals. She has completed a study on the Fillmore Arts Center in Washington, D.C. to be published in Daedalus. She is currently conducting an interview study of women leaders in up-state New York. This summer she will begin a book on issues in Migrant Education, the culmination of three years of data collection using interview and observation techniques.

Professor Janesick is familiar with the substance of the Special Education in Rural America project having read the literature related to PL 94-142 under two influences:

1) She recently Chaired the dissertation of Lorenzo Licopoli who wrote on the implementation of PL 94-142 in four school districts in upstate New York.
2) She served as a member of the SUNY Albany Dean's Grant Committee 1981-82, to help develop a plan to educate faculty members about PL 94-142. Furthermore, as Project Director for The Migrant Tutorial Outreach Program at SUNY-Albany, she is familiar with delivery of tutorial services to rural disadvantaged children of migrant farmworkers.

BEST COPY AVAILABLE

BEST COPY AVAILABLE

Valerie J. Janesick
Assistant Professor
Department of Program
  Development & Evaluation
State University of New York at Albany
1400 Washington Avenue
Albany, New York 12222
Offices: 518-457-8238
518-455-6249

190 Spring Street, Apt. 5
Albany, New York 12203
Home: 518-436-7459

EDUCATION:

Ph.D.	1977	Michigan State University East Lansing, Michigan Curriculum and Instruction: Concentration in philosophy, sociology and classroom ethnography and application of research to continuing education for teachers.
Postgraduate Studies Grant	1971-72	University of Michigan Ann Arbor, Michigan Ford Foundation Grant in Communication Studies
M.A.	1971	Bowling Green State University Bowling Green, Ohio Radio-TV-Film
B.S.	1970	Eastern Michigan University Ypsilanti, Michigan Drama-English Education

RELATED QUALIFICATIONS:

- Fourteen years teaching experience includes: elementary, middle school, junior college and university levels.
- Teaching experience in continuing education for veteran teachers.
- Administrative experience as Project Director for a major training grant at a major university; director of a 600-person residence hall at a major university.
- Extensive experience as a researcher employing ethnographic techniques in educational settings including: interview, participant observation, and field research of extended durations.
- Demonstrated ability in program development and curriculum planning, implementation and evaluation.
- Experience in conducting demographic studies.
- Experience in writing and editing research proposals.
- Experience in obtaining funding at a major university from state and federal sources.
- Extensive study of communication, philosophy, social psychology, educational psychology (learning and cognition emphasis) and the arts.
- Public relations experience as organizer, publicist, interviewer, introducer of visiting international scholars in a colloquia series at a major university.

PROFESSIONAL EXPERIENCE:

Teaching

Assistant Professor, School of Education, Department of Program Development and Evaluation, State University of New York at Albany, 1979 - present. Teaching graduate courses in Ethnographic Research in School Settings, Instructional Analysis, Elements of Supervision, and Supervision in the Elementary School. Coordinator of graduate interns in Curriculum and Instruction and supervision of interns in their fieldwork. All academic duties; school, departmental, and student committees.

Project Director: State University of New York at Albany, Tutorial Program. All administrative and training function; tutorial program development; in-service training seminars for students; represent New York State on the National Migrant Reading Curriculum Committee, Little Rock Arkansas.

Outside Examiner and Visiting Professor, University of Alberta, Edmonton, Alberta, Ethnographic Research Workshops, invited seminars.

Visiting Professor. University of Regina, Regina, Saskatchewan, Summer Session 1982, teaching graduate course in Program Evaluation.

Assistant Professor, Department of Education, California Polytechnic State University, San Luis Obispo, California, Academic year 1978-1979. Taught courses in Instructional Processes and Learning Processes and seminar on Learning Theory and Cognitive Development. Supervising student teachers in elementary and secondary schools.

Instructor, Lansing Community College, Lansing, Michigan, August 1977-1978. Taught courses in Dance History, Choreography, Modern Dance, Medieval-Preclassical Dance and Ballet.

Assistant Instructor, Michigan State University, September 1977-August 1978. Taught seminars in Philosophy in the Classroom Curriculum Construction, Foundations of Education, Child Development. Supervised intern-teachers. Conducted research for the Teacher Education Department.

Graduate Assistant, Michigan State University, September 1974-August 1977. Teaching duties included seminars on: Ethics and Education, Logic for Teachers, Foundations of Education.

Graduate Assistant, Bowling Green State University, September 1970-August 1971. Taught courses in communications and speech, Introduction to Broadcasting, Filmmaking I-II.

Teacher of Grades 1-2, for two years, and Grades 6-7-8, for one year, in the Detroit, Michigan, area.

BEST COPY AVAILABLE

Research

1979-present - Principal Investigator - Migrant Education Project (ethnographic)

1978-1979 - Principal Investigator - Teaching at the University level (ethnographic)

1976-1977 - Principal Investigator - Case Study of a Teacher's Classroom Perspective (ethnographic)

1970-1971 - Principal Investigator - Demographic Study of Broadcasting Stations in North-Central Ohio

Administration of Funded Projects

1980-present Project Director, State University of New York at Albany, Tutorial Outreach Program

July 1, 1980-June 30, 1981	$119,000.00
July 1, 1981-September 30, 1981	$19,500.00
Oct. 1, 1981-June 30, 1982	$82,000.00
July 1, 1982 - June 30, 1983	$85,772.00
July 1, 1983 - June 30, 1984	$72,000.00

Consulting

1974-present School districts in Michigan, California, University of Alberta at Edmonton, Albany BOCES, University of Kansas, Lawrence, Kansas.

Curriculum Development

1975-present Various projects at Michigan State University, Teacher Corps Project; Lansing Community College, Associate Arts Program; State Department of Education, Lansing, Michigan; State University of New York at Albany, Tutorial Outreach Program tutor training.

Publications

"Accountability and the Schools," *Secondary Education Today*, Summer 1975. Journal of the Michigan Association of Secondary School Principals.

Review of Dan Lortie's book, *School Teacher*, in *Secondary Education Today*, Fall 1976.

Dissertation: "An Ethnographic Study of a Teacher's Classroom Perspective." This descriptive case study was undertaken over a ten month period. One elementary school teacher was observed and interviewed over time to determine his classroom perspective.

Monograph: Research Series No. 33, Institute for Research on Teaching, Michigan State University, East Lansing, Michigan, 1979. "An Ethnographic Study of a Teacher's Classroom Perspective."

"The Teacher's Classroom Perspective as the Classroom Curriculum," *Secondary Education Today*, Volume 21, Number 3, Spring 1980.

Publications

"Of Snakes and Circles: Understanding Group Process through a Case Study," Curriculum Inquiry, Summer 1982.

"Art Education as Experience: A Reply to Art Education as Ethnology," Studies in Art Education, Spring 1982.

Book Review of Green, Judith and Cynthia Wallatt, Ethnography and Language in Educational Settings for Journal Reading Behavior, Spring 1982.

"Constructing Grounded Theory: Reflections on a Case Study of a Professor of Architectural Design", Studies in Art Education, Vol. 24, November 1, 1982.

"Developing Grounded Theory: Reflections on a Case Study of An Architectural Design Curriculum", Monograph. Society for the Study of Curriculum History. Fall 1982.

In Press

"Inside The Fillmore Arts Center: Experience, Community and Celebration." DAEDALUS. Winter 1983.

Out for Review

"Using Ethnographic Techniques to Improve Tutoring of Migrant Students"

"The Qualitative-Quantative Argument in Educational Evaluation," with Edward F. Kelly

"Twenty Most Often Asked Questions Regarding Ethnographic Techniques in Educational Research"

"Making Use of a Classroom Journal as a Staff Development Technique"

Reports

1975	A Preliminary Report on the Oakley Park Elementary School Evaluation Project 1974-1975 (Lilly Foundation)
1976	Toward Excellence in Elementary Education (EEE) and Teacher Corps Project update (Teacher Corps)
1977	A Proposed Teacher Education Model for Michigan State University (Model 85e) Underlying Rationale
1977	Qualitative Research Related to Teacher Education: A Literature Review

PRESENTATIONS

1983	Audit of Naturalistic Study on Special Education in Rural America	University of Kansas, Lawrence Kansas
1982	Concordia University Montreal, Quebec	Workshop on "Ethnographic Research Methods: Processes and Applications in Classrooms"
1982	University of Utah Salt Lake City	One week training and development workshop: "Ethnographic Research: Implications for Educational Administration"
1982	AERA New York City	AERA RESEARCH TRAINING MINICOURSE "Ethnographic Educational Research: An Overview of Foundations, Practice, Misconceptions, and Related Issues"
1982	Rochester, New York	Thirteenth Annual Eastern Stream Regional Migrant Education Conference "Program Evaluation and Job Performance Review for Migrant Education Staff at the Local Level"
1982	University of Alberta Edmonton, Alberta	"Ten Most Often Asked Questions Regarding Qualitative Research Methods"
1981	Albany, New York Empire Plaza Convention Center	Conference on "Reading in Classrooms: New Ways of Looking" "Using a Classroom Journal to Improve Teaching"
1981	University of Alberta Edmonton, Alberta	Keynote speaker with Prof. Harry Wolcott, of the University of Oregon "Ethnographic Research and Educational Administration"
1981	AERA Los Angeles	"A Theory About Theories: Making Sense of the Classroom Perspective Through Symbolic Interaction"
1981	Center for Urban Ethnography Univ. of Pennsylvania Philadelphia	"A Case Study of Excellence in Teaching: Findings and Research Issues"

1981	Eastern Stream Migrant Education Conference Cherry Hill, New Jersey	**"Teaching and Learning Styles: Research and Practice"**
1980	Northeastern Educational Research Association Ellenville, New York	**Conducted workshop on Ethnographic Research Methods**
1980	AERA Boston	**"The Design of Design: An Ethnographic Study of Curriculum Construction"**
1980	New York State Migrant Education Conference Syracuse, New York	**"Teaching and Learning Styles: Making the Most of Tutoring"**
1979	AERA San Francisco	**"An Ethnographic Study of a Teacher's Classroom Perspective: Implications for Curriculum"**
1977 1976 1975	Michigan Association of Science, Arts and Letters Mt. Pleasant, East Lansing, and Ann Arbor, Michigan, respectively	**Respectively:** **"Stages of Development: A Comparison of Piaget and Kohlberg"** **"Philosophy for Children: Models for Teacher Education"** **"Integrating Philosophy, Methods, and Experience in Teacher Education Programs"**

BIOGRAPHICAL DATA:

Born September 9, 1946, in Detroit, Michigan. An avid student of literature, philosophy and the dance. Have been a dance instructor for ten years. In excellent health. Traveled to Spain, Scotland, England, the Netherlands, Canada, and throughout the United States of America. As a freelance photographer have exhibited works in Michigan, Ohio, California and New York.

PROFESSIONAL ASSOCIATIONS

American Educational Research Association; National Society for the Study of Education; Phi Delta Kappa; Bertrand Russell Society; Association for Supervision and Curriculum Development.

REFERENCES:

Lee Shulman	Stanford University	
Philip Cusick	Michigan State University	517-353-1747
Keith Goldhammer	" " "	517-353-1747
Judith Lanier	" " "	517-355-1849

REFERENCES:

Myer Horowitz	University of Alberta	403-432-3212
Al Mackay	" " "	403-432-2073
Douglas M. Windham	State University of New York at Albany	518-457-8549
Edward F. Kelly	State University of New York at Albany	518-457-8215

Appendix B

Table of Interviewees

Tables of Interviewees

State Agencies and Educational Service Agencies

SITE	SEA	EDUCATIONAL SERVICE AGENCY					SUBTOTAL
	Admin/ Program Dirs.	Admin/ Program Coords.	Board Members	Special Teachers	Support Personnel	Vocational Education	ESA
Riverhill	3	[illegible]	5	11	4	2	30
Midland	4	18	2	12	9	2	43
Foothills	6	12	3	15	4	5	39
Seaside	4	7	NA	NA	NA	NA	7
N. Slope	1	[illegible]	1	NA	7	NA	15
Totals	18	[illegible]	11	38	24	9	134

Local Education Agencies

SITE	LOCAL EDUCATION AGENCIES										SUBTOTAL
	Supts.	Prinps.	Board Mbrs.	Director SpED	Spec. Teachers	Supp. Pers.	Reg. Teachs.	Voc. Ed.	Parents	Other Agency	LEA
Riverhill	5	9	2	NA	NA	NA	14	NA	6	1	37
Midland	8	13	3	NA	9	NA	8	NA	18	2	61
Foothills	8	4	2	NA	2	NA	4	NA	3	-	23
Seaside	5	3	2	5	11	2	5	2	4	-	39
N. Slope	6	8	[illegible]	NA	9	NA	5	NA	2	-	32
Totals	32	37	11	5	31	2	36	2	33	3	192

Grand Totals

SITE	SEA	ESA	LEA	SUBTOTAL
Riverhill	3	30	37	70
Midland	4	43	61	108
Foothills	6	39	23	68
Seaside	4	7	39	50
N. Slope	1	15	32	48
Total	18	134	192	344

BEST COPY AVAILABLE

INTERORGANIZATIONAL SPECIAL EDUCATION PROGRAMMING IN RURAL AREAS: TECHNICAL REPORT ON THE MULTISITE NATURALISTIC FIELD STUDY

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

VOLUME II

Research Contract No. 400-81-0017 from
the National Institute of Education to the
Department of Special Education
University of Kansas, Lawrence, Kansas 66045

© 1985

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

This report is made pursuant to Contract 400-81-0017. The amount charged to the Department of Education for the work resulting in this report (inclusive of the amount so charged for any prior reports submitted under this contract) is $194,922.77. The names of the person, employed or retained by the Contractor, with managerial or professional responsibilities for such work, or for the content of the report, are as follows: Thomas Skrtic, Earle Knowlton, Egon Guba, Neil Salkind, Edward Meyen, Kathleen Bolland, Stephen Foster, Lynda Schoonmaker.

The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that agency.

TABLE OF CONTENTS

VOLUME I
PART Page

I Introduction 1
  The Problem 1
  The Field Study Research Questions 2
  Overview 4

II Methods 6
  The Emergent Paradigm of Thought and Belief 6
  The Paradigm of Naturalistic Inquiry 10
  Implications for the Doing of Inquiry 14

III Procedures 20
  The Design Update 20
  Site Selection 21
  Procedures for First Visit to Each Site 24
    Initiating Contact and Gaining Entre 24
    Sampling Respondents 25
    Consent Forms 25
    Logistics 26
    Interviewing 27
    Document Collection 30
    Journal Entries 30
    Other Activities 31
    On-Site Team Interactions 32
    Debriefing 33
  Analyzing Site Visit 1 Data 34
    Unitizing 34
    Individual Categorizing 35
    Team Categorizing 37
  Procedures for Second Visit to Each Site 38
  Analyzing Site Visit 2 Data 40
  Drafting the Case Study 40
    Indexing the Materials 40
    Generating an Overall Outline 41
    Cross-Referencing Materials to the Outline 43
    Conventions Governing the Writing 44
    Integrating Themes Drawn from the Research Synthesis 46
    Developing Questions for Site Visit 3 48
    Abstracting Problems/Issues and Generating Lessons to be Learned 48
  Internal Review and Revision of the Case Study 49
  Procedures for Third Visit to Each Site 50
    Selecting the Review Committee 50
    Delivery of Pre-Visit Packet 51
    The All-Day Review Meeting 52
    Interviews with Special Respondents 53
    Debriefing 54

Final Revision of the Case Study . . . 54
Trustworthiness . . . 55
  Counterpart Criteria . . . 55
  Operational Techniques for Meeting the Trustworthiness Criteria . . . 57
  The Present Study and Trustworthiness . . . 59
Notes on Methodological Issues . . . 62
  Some Practical Issues . . . 62
    Contract/Paradigm Disjunctions . . . 62
    Design Problems . . . 64
    Problems in the Field . . . 67
    Problems in Writing the Case Study . . . 69
    Problems with the Member-Check (Review Committee) Process . . . 73
  Some Theoretical Issues . . . 75
    The Feasibility and Utility of Trustworthiness Measures . . . 75
    Fitting the Naturalistic Paradigm: Was the Right Model Selected to Guide the Inquiry? . . . 78

IV Results . . . 81
Introduction . . . 81
Organizational/Governance Issues . . . 81
Service and Delivery Mechanism Issues . . . 94
  Instructional Programs . . . 94
  Non-Instructional Services . . . 95
  Some Observations . . . 96
  Child Find . . . 97
  The Staffing (IEP) Process . . . 98
  Facilities . . . 102
  Private and Parochial Schools . . . 104
  Recruitment and Retention . . . 106
  Organizing for Service Provision . . . 107
  Training . . . 110
  Administrative Relationships . . . 112
  Parental Involvement . . . 113
  Involvement in the IEP/Staffing Process . . . 114
  Due Process . . . 115
Effectiveness and Impact Issues . . . 117

V Generality of Findings . . . 134

VI Conclusions and Policy Recommendations . . . 136
Caveats . . . 136
Needs . . . 139
Trade-Offs . . . 141

References . . . 147
Appendix A: Auditor's Report . . . 149
Appendix B: Tables of Interviewees . . . 164

VOLUME II
APPENDIX

C Site #1 Case Study 1-88

D Site #2 Case Study 1-124

VOLUME III
APPENDIX

E Site #3 Case Study 1-66

F Site #4 Case Study 1-134

G Site #5 Case Study 1-43

VOLUME IV
APPENDIX

H Commissioned Papers . . . .

° Special Education in Rural America, Paul A. Worth 1-53

° Dean's Grants Projects and Rural Education, Maynard C. Reynolds 1-50

° Local Implementation of P.L. 94-142: Similarities and Differences Between Rural and Nonrural Local Education Agencies (LEAs), Anne R. Wright 1-19

° Problems and Strategies Regarding Regionalizing Service Delivery: Educational Collaboratives in Rural America, Doris Helge 1-47

Appendix C

Site #1 Case Study

Riverhill County Educational Cooperative

RIVERHILL COUNTY EDUCATIONAL COOPERATIVE:
A CASE STUDY

The first of five case studies appended to
Interorganizational Special Education Programming in Rural Areas:
Technical Report on the Multisite Naturalistic Field Study

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

November 10, 1982

© 1982

Department of Special Education
School of Education
University of Kansas
Lawrence, Kansas 66045

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that agency."

TABLE OF CONTENTS

Page

LIST OF TABLES iii

LIST OF ILLUSTRATIONS iv

SECTION

1 Introduction 1

2 Demographics 4

3 Purposes of the Cooperative 8

4 The Structure of the Cooperative 11

5 The Targets for Cooperative Services 15

6 Cooperative Functions and Operations 16

- Processing of Clients 18
- Programs 22
  - The LD Program 23
  - The EMR Program 25
  - The Speech/Language Program 26
  - The ED Program 27
  - The Gifted Program 29
  - The Vocational Program 30
- Related Projects 31
  - The Career Orientation Project 31
  - The Vocational Sexism Project 32
  - The Drivers for Special Buses Project 32
  - The Sheltered Workshop 33
- Support Services 33
- Training 34
  - Regular Teachers 34
  - Cooperative Staff 35
  - Paraprofessionals 35
- Development and Change 35
- Evaluation/Monitoring 37
- Due Process/Parental Involvement 38
- Public Relations/Communications 42
- Managing Political Factors 42

7 Facilities 43

8 Professional Staff 45

9 Paraprofessional Staff 47

10 Funding 49

11 Scheduling 53

12 Relationships of the Cooperative 55

Relationships with Member LEAs 55
Relationships Between Special and Regular Teachers 56
Relationships Between Special Teachers and Administrators 57
Relationships with the State Department of Education 58
Relationships with Parents and the Community . . . 59
Relationships with Other Service Agencies and Cooperatives 61

13 Some Problems of Particular Concern to the Cooperative . 61

Interpretation of and Compliance with P.L. 94-142 . . . 62
Paperwork 64
Bifurcation of Control and Responsibility 65
Stigma 67
Community Ignorance and Parent Apathy 69
Low Level of Resources 69
Pupil Staffing Difficulties 71
Transportation 72
Problems of Itinerancy 73
Getting and Keeping Qualified Personnel 74
Local Traditions and Practices 75

14 What Can Be Learned from the Case? 77

15 Epilog 86

LIST OF TABLES

Table Page

1 Demographic Data for Riverhill County Schools, 1981-82 . . . 5

2 Number and Type of Exceptional Children Served, By Age (10/10/80 and 5/6/81) 7

3 Number and Percent of Exceptional Children Served , and Costs per Student Served, by District (Fiscal 1981) 9

4 Services Offered to Exceptional Children by the Cooperative. 17

5 Cooperative Budget Categories and Amounts for 1981-82 . . . 52

LIST OF ILLUSTRATIONS

Figure | Page

1 Map of Riverhill County 1a

2 Organization of the Riverhill County Educational Cooperative 13

3 Flow Chart of The Cooperative Client Processing Steps. . . 19

4 Flow Chart of The Cooperative Due Process Hearing Steps. . 40

There are few motels in Riverhill County. There are no Interstate highways, and the largest town numbers only about 1,400 souls. In any event, just across the river to the west, which is also the state line, there is a medium-sized city with an Interstate cleaving it and an abundance of "brand-name" motels. When we visited we stayed in one of those.

There's only one way into Riverhill County from there--across a high bridge that gives the approaching traveler a bird's eye view of what we will find on the other side. That's Rivertown below--marrily a bedroom suburb for the city we just left although with its share of small industries--sprawled on the flood plain and convoluted to fit itself to the river's meanderings. The county, we soon find as we drive east (see Figure 1), harbors two cultures, to fit its two geographically differentiated areas. The "river people" live in the flood plain of the west end, a plain partly urbanized and, despite its geologic origins, not much suited to agriculture. The "hill people" live on the rolling hills of the east end, tilling what at first appear to be intractable, rocky slopes, but on close examination turn out to be uncommonly fertile glacial deposit's bringing as much as $2,000 per acre. The hill people and the river people don't have much in common; the former are "old families" whose great-grandfathers moved to Riverhill from the Midwest a century ago, while the latter are relative transients who have lived here perhaps only a generation at best. They work at different kinds of jobs; they enjoy different levels of the socio-economic scale; they are racially and ethnically dissimilar. But they do have something in common. They have handicapped children.

The county has five unified school districts within its boundaries, with four of them located in the four largest towns. Rivertown, that we just passed through, has 261 pupils and 23 teachers, housed in a ratively new building. A century ago Rivertown's population had a large proportion of blacks; now its blacks number 10 to 15 percent while the remainder are white, blue-collar commuters, although a number of small industries are located in Rivertown in which some of them work. Some of the folks elsewhere in the county nevertheless persist in characterizing Rivertown as black, or ascribe to it other pejorative characteristics: factory workers, one-parent families, "free-lunch kids," on welfare.

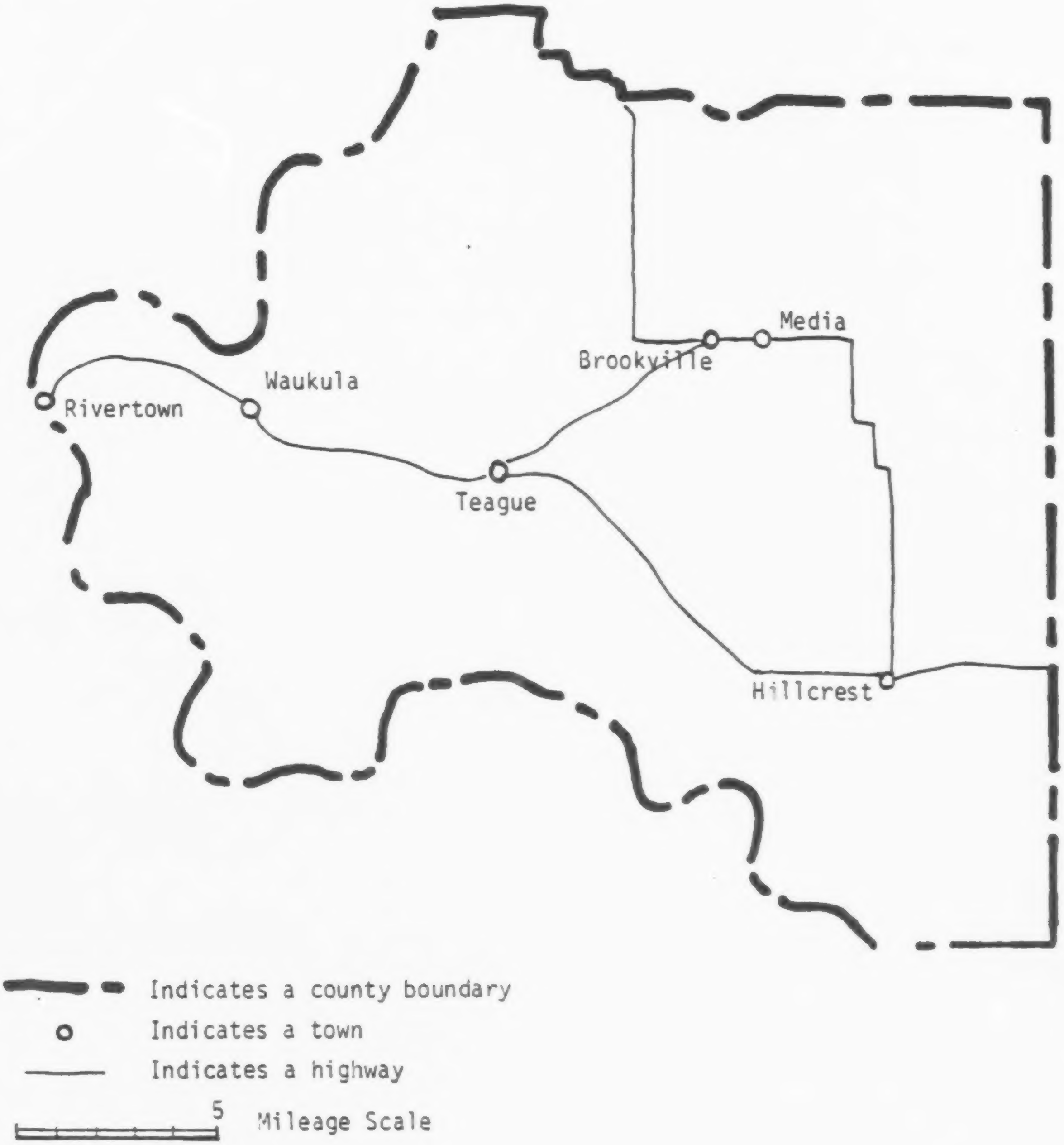
A few miles to the east we enter Waukula, the largest of the five districts, with 500 pupils and 43 teachers. Waukula is the only community in the county that has shown any appreciable population shift over the past decade, increasing in size by about one third as it, like Rivertown, assumes the characteristics of a suburban, bedroom community. Indeed, Waukula has taken over as the suburban "hub." The town also has acquired some industry of its own.

Another short drive east brings us to Teague, the county seat, nearly as large in school population as Waukula with 450 pupils and 36 teachers. Teague is very conservative, comprised historically of older residents; it serves primarily as a service center for the surrounding agricultural community.

To the southeast lies Hillcrest, with 310 pupils and 25 teachers. Hillcrest houses the county's community college and is also a small-scale tourist center. The area has maintained the flavor of its ancestral

Figure 1

Map of Riverhill County


Media
Brookyille
Waukula
Rivertown
Teague
Hillcrest
Indicates a county boundary
Indicates a town
Indicates a highway
5
Mileage Scale

European culture which many visitors find charming. The community is favored with a new school building erected when the original was destroyed by fire. While all of the communities are vigorously autonomous, Hillcrest is most so. Recently, because of a new low-income housing project, new residents have been drawn here from nearby cities; they are characterized as "transients" and "poor people" who "get a lot of freebies."

The last district, Media, stands in a compromise location more or less at the center of a cluster of tiny communities whose separate schools it replaced (not without a struggle) just a few years ago. Media is nevertheless the smallest of the districts with 231 pupils and 23 teachers. Needless to say, its entire student population is bussed to the school site.

The administrative staffs of those small districts are correspondingly modest. Waukula manages with a superintendent, a secondary principal, and an elementary principal who oversees two schools. Teague has a superintendent, an elementary principal, and a secondary principal. Rivertown has a superintendent while another person doubles as both elementary and secondary principal; in Media the superintendent also serves as elementary principal; while in Hillcrest the superintendent is also the secondary principal.

The total enrolled population, K through 12, is thus 1,752; these pupils are serviced by 150 teachers and 13 administrators. The whole is about the size of a medium high school in an urban setting (although with more teachers and administrators than would be found there). But the enrollment is spread over an area of 388 square miles. We're in a rural setting in which the population averages 23.7 persons per square mile.

Stability and continuity characterize the communities of Riverhill County. The population has remained essentially the same for more than a decade. The five local school districts have enjoyed continuous leadership in excess of the lifetime of the Cooperative which mutually services them. There is a lot of local pride; the citizens see themselves as self-sufficient and conservative; local autonomy is a keynote in their self-image. They are pleased to reside in rural America, and retain many of the traditional values often described as "the American way." Riverhill County is a good place to live, and most of its inhabitants prefer its life-style to any other.

Prior to 1974-75 school year, each of these districts separately maintained whatever programs existed for handicapped children--or independently contracted for needed services from surrounding counties in which they were available. There is no reason to doubt that the districts were each committed to doing what they could for these youngsters. It was apparent, however, that none of the districts could muster the resources necessary to provide the level of service that might be considered adequately responsive to the need. The districts mounted no special efforts to locate every handicapped child; there seemed to be little point in identifying the low-incidence handicapped since little could be done for them.

A number of factors interacted to produce a change. The Congress of the United States had already passed P.L. 93-380, the Education Amendments of 1974, Part B, which was seen as the precursor to what ultimately became P.L. 94-142, the Education for All Handicapped Children Act. It was obvious that some form of cooperative action would be required to meet the mandates of thse laws. Further, the state department of education had already begun the disbursement of funds in ways supportive of the intent of the forthcoming act. And so the five districts made a move that could only be considered novel and daring, considering the great weight placed on local autonomy by the people of Riverhill County: they united under the leadership of Teague as the "host agency"--the fiscal and legal agent--to form the Riverhill County Special Education Cooperative, one of two forms of cooperation authorized under state law. Under this agreement, Teague underook to provide needed services for the handicapped children from all five districts, while the other four agreed to support the costs of the services on an "equal-shre" basis--regardless of the number of handicapped students they might send--and to provide the transportation to get them to the facilities provided by Teague.

The first director of the new organization was charged to coordinate the existing programs--EMR, LD, and speech--and to plan and implement all additional programs that would be required to meet the mandates of the state and of P.L. 94-142. Offices for the new cooperative were established in office building space rented by the Teague board of education for the purpose. Classrooms were set up in two mobile units located in Teague and in two regular classrooms provided at Media and Waukula.

The special education cooperative enjoyed mixed success. The facilities that were provided were not the best; indeed, they represented the "left-overs" after the host agency's "regular needs" had been accommodated. The rented office space became unavailable when the building's major tenant, a local physician, decided that he wanted to expand his own facilities (a decision eventually reversed). That problem was solved by moving the Cooperative to a somwhat refurbished and no-longer-used elementary building at Brookville which had been replaced as a result of the formation of the Media district. Several districts fet that Teague was spared problems of student transportation and student inconvenience by virtue of its host status and began lobbying for a more equitable arrangement. By programmatically the Cooperative provided some benefits that could not be gainsaid; indeed, the director of the organization (the second director; the first was felled by a heart attack early in the 1978-79 academic year and was replaced, first, temporarily, and then permanently, by a former superintendent of the Media district who had resigned the year before to open a school supplies business, and who was pressed into service because of the emergency) was able to boast in an open letter published on June 15, 1979:

> 1978-79 has been an exciting and eventful year for special education in Riverhill County. Mandates provided for in 94-142 have been met to the best of our ability and exceed the efforts of many areas in our state. Through a diversity of program options, we are in compliance with the intent of 94-142 concerning cases of which we are knowledgeable.

> . . . .
>
> The changes we have made cannot be achieved with out a multiplicity of confusion and conflict. Only the outstanding cooperation of the boards, administration, teachers, and students and their understanding of the situation have made our current progress possible and future progress attemptable. Thanks to all for caring about kids.

Indeed, the parties to the cooperative agreement were sufficiently impressed with its success that as early as the middle of the 1978-79 school year, they began negotiating a new Agreement, moving into the second of the two types of legally permissible organization that permitted them to cooperate not only in special education but in other areas as well. So the Riverhill County Educational Cooperative (the organization retained most of its former name despite moving into its new legal form) also provides services in the areas of career education, media, curriculum development, and in-service training.

It should not be supposed, however, that the decision to cooperate was uniformly applauded. There seems to be little doubt in the minds of most local observers that without the impetus of 94-142 and its precursor, there would have been no cooperative--the need for it was perceived to be "laid on." Most citizens felt that there was no necessity for effort beyond that which had been voluntarily expended by the individual LEAs in order to service the children adequately. Indeed, resistance to any form of consolidation had been a hallmark of the county; for example, the proposal to replace local schools by the Media complex had been defeated at the polls three times before it was finally approved. Resistance to the idea of a cooperative is well symbolized by the fact that the local districts, which had earlier agreed to a common time schedule to accommodate sporting events (the independent districts were all members of the same athletic conference), decided after the establishment of the Cooperative to move to independent (and conflicting) schedules. A common calendar was simply a reminder of the loss of local control, and needed to be eliminated, however much such a move might complicate the bussing of handicapped youngsters from district to district. Local pride was from the start a significant impediment to the efficient and effective operation of the Cooperative.

Demographics

Riverhill County is modestly sized--388 square miles with a total population of 9,327. Even the four "big" towns in the county would appear minute to an urban dweller; their populations (1981) are: Hillcrest--954; Rivertown--1,275; Teague--1,240; and Waukula--1,418.

The schools are not unusual for settings of this type. The relevant demographic data are shown in Table 1. Organizations differ depending on local custom and history. Elementary enrollment (defined arbitrarily by the state education agency as comprising grades K-6) is just under two-thirds of the total. Pupil/teacher ratios are low by urban if not rural standards:

TABLE 1

DEMOGRAPHIC DATA FOR RIVERHILL COUNTY SCHOOLS, 1981-82

District	Organization	Enrollment			Faculty	Pupil/ Teacher Ratio	Number of Administrators
		Elem.	Sec.	Total			
Hillcrest	K-8-4	212	98	310	25	12.4	3
Media	K-6-2-4	146	85	231	23	10.0	2
Rivertown	K-8-4	175	86	261	23	11.4	2
Teague	K-8-4	300	150	450	36	12.5	3
Waukula	K-6-6	265	235	500	43	11.6	3
Total	---	1,098	654	1,752	150	11.7	13

11.7 to 1 overall and ranging from a low of 10.0 to 1 in Media to a high of 12.5 to 1 in Teague.

The distribution of exceptional youngsters included in the school census is shown in Table 2. This table displays data by age and type of exceptionality as of May 6, 1981. Included also are comparable data (as available) for Riverhill County October 10, 1980--the beginning of the same academic year, and statewide data for Fiscal Year 1981. Several points are strikingly apparent:

1. Three classes of handicap account for 84 percent of the pupils served by the school system: learning disabled, speech/language impaired, and educable mentally retarded. These are the same three categories that had been served prior to the establishment of the Cooperative.

2. The largest proportion of handicapped children is found in the 6-11 age group; indeed, the number in this age group exceeds the sum of all other age groups combined. It is unlikely that handicapping conditions are so distributed in the population, even given that attendance attrition will produce some later age reductions.

3. The absolute numbers of low incidence handicaps are very small: 5 TMR, 1 PH, 2 SMH. Nevertheless these children are receiving service, and undoubtedly of a very special sort.

4. The number of ED youngsters is quite low and concentrated in the 15-17 age group.

5. The number of children assigned to the gifted program is small, fewer than 10 percent of the total.

6. There is a striking increase in the numbers of children placed in the LD and S/L programs at the beginning and end of the school year for which data are given in Table 2. LD numbers increase from 57 to 76 in the period from 10/10/80 to 5/6/81 and from 26 to 49 in S/L. But of course LD and S/L children are usually in school--it does not require a massive child find program to locate them. It seems likely that these increases result from increased teacher sensitivity leading to referral, and of course, the existence of programs makes referral possible and heightens sensitivity even further.

7. Largely because of the increase in LD and S/L placements, the total number of children being served by the program increased dramatically over the course of the school year (10/10/80 to 5/6/81), by a proportion of almost 40 percent. The data suggest that when programs become available some teachers become aware of the possibility of referral and use it.

TABLE 2

NUMBER AND TYPE OF EXCEPTIONAL CHILDREN SERVED, BY AGE (10/10/80 AND 5/6/81)

Handicap	As Of 5/6/81							As Of 10/10/80		Statewide Fiscal '81
	Age					Total				
	<5	6-11	12-14	15-17	18-21	N	%	N	%	%
Learning Disabled	0	23	31	16	6	76	39.4	57	41.3	30.0
Educable Mentally Retarded	0	22	5	10	0	37	19.2	35	25.4	10.2
Trainable Mentally Retarded	0	4	1	0	0	5	2.6	5	3.6	3.1
Physically Handicapped	0	1	0	0	0	1	0.5	*	*	1.4
Severely Multiply Handicapped	0	1	0	1	0	2	1.0	2	1.4	0.9
Emotionally Disturbed	0	0	0	4	0	4	2.1	*	*	6.5
Speech/Language Impaired	2	45	2	0	0	49	25.4	26	18.8	30.2
Gifted	0	6	8	5	0	19	9.8	13	9.4	16.0
Total	2	102	47	36	6	193	100.0	138	99.9	99.8

*Information not available.

8. The data for Riverhill County are somewhat different from those for the state as a whole (using 5/6/81 data for the County and FY 81 data for the state). The largest difference is in respect to learning disabled youngsters, with Riverhill Cooperative running 9.4 percentage points higher than the state (39.4 percent vs. 30.0 percent). Educable mentally retarded pupils are also overrepresented by 9.0 percentage points (19.2 vs. 10.2). Gifted are underrepresented by 6.2 percentage points (9.8 vs. 16.0), while emotationally disturbed and speech/lanuage cases are both underrepresented on the order of four and a half points (2.1 vs. 6.5 and 25.4 vs. 30.2 respectively). The reamining differences are small but since these categories are f lw incidence, even small differences may be relatively meaningful.

A final set of demographic data is displayed in Table 3, showing, for Fiscal Year 1981, the number and percent of exceptional children originating in each district, as well as per pupil costs. Immediately evident is the disparity in the proportions of children referred from each of five districts. Hillcrest, Media, and Waukula sent, respectively, 11.94, 10.82, and 11.00 percent of regularly enrolled youngsters, while Rivertown and Teague sent 16.85 and 7.11 percent respectively. It is unlikely that handicapped youngsters are distributed in such uneven proportion over the county. It is interesting to note that Teague, the "host agency" of the earlier county-wide federation, accounts for only 16.58 percent of youngsters serviced by the Cooperative--despite the fact that it exceeds in total enrollment all of the other districts but one. These differences in numbers served are immediately reflected in costs per student, in view of the fact that costs are pro-rated to districts in an equal-shares basis. The reasons for these disparities are not immediately clear, although it is evident that the services of the Cooperative are used differentially by the member districts.

The Cooperative works closely with a number of other agencies in the community. Student evaluations are sometimes aided by referral to the Family Center, Protestant Hospital, Aural Associates, and others that may be deemed appropriate in special cases. Efforts to identify exceptional children are assisted by local dentists, physicians, and other health services, by the Social and Rehabilitative Services, and the annual CATCHMENT LOCATER Clinic (the Cooperative's annual screening procedure). Contact is also maintained with the Social Welfare Department, the Head Start Program, the Community Mental Health Agency, the regional worker for the state screening program, the state mental health center, and the County Health Officer. In addition, contracts for services are maintained with adjacent counties to provide certain program services; see below.

There are no private or parochial schools in Riverhill County; hence the Cooperative has found it unnecessary to evolve procedures for relating to such units.

Purpose of the Cooperative

In response to the requirement posed by the state department of education that the agency shall, in its local comprehensive plan (required

TABLE 3

NUMBER AND PERCENT OF EXCEPTIONAL CHILDREN SERVED AND COSTS PER STUDENT SERVED BY DISTRICT (FISCAL 1981)

District	Enrollment of Exceptional Children		Total Enrollment	Percent of Total Enrollment	Cost Per Student Served (Dollars)
	N	Percent			
Hillcrest	37	19.17	310	11.94	1,087
Media	25	12.95	231	10.82	1,609
Rivertown	44	22.80	261	16.85	914
Teague	32	16.58	450	7.11	1,257
Waukula	55	28.50	500	11.00	731
Total	193	100.00	1,752	11.02	1,042

under P.L. 94-142), state its "philosophy and/or general goals regarding the education of exceptional children," the Riverhill Cooperative stipulates that:

> We, as members of the Riverhill County Education Cooperative, stand firm in our conviction of quality education for the individual student.
>
> We are unified in our desire to provide the services necessary for insuring each child an opportunity to achieve at the maximum of that child's abilities and capabilities.
>
> We are in concert in our belief that an atmosphere of cooperation, trust and confidence provides maximum opportunity for growth within and among educators, students, parents, other professionals and the community-at-large.
>
> We share a common desire to meet the provisions for exceptional children as set forth in legislative action by making a free and appropriate educational program available to each exceptional child regardless of the exceptionality.
>
> We are unanimous in our concern for the dignity and self-esteem of the individual.
>
> We are united by a positive attitude toward the child and the child's total environment and the important place education has in that milieu.

In setting up the Cooperative agreement*, however, the members shunned this rhetoric in favor of a more pragmatic statement:

> Educational Services to which this . . . Agreement relates are limited to Special Education, Career Education, Media Services, Curriculum Development, In-Service Training for Staff Programs and such other purposes permitted by the laws of [State].
>
> The Cooperative shall provide during the term of this agreement, Special Education for the appropriate students of each district that is a party to this Agreement at least equal to those areas of special education that are mandated by the [State] legislature, beginning with the 1979-80 school year.

And what are those mandated areas? They are those covered by two separate state laws and by P.L. 94-142. The first of the state laws provided for educational services, beginning in 1974, for "developmentally disabled" children and youth, and defined "developmental disabilities" as mental retardation, specific learning disabilities, cerebral palsy, and epilepsy. The second act required special education programming for all handicapped children by 1979 and for all gifted children by 1980.

---

* The legal document establishing the Cooperative as an entity; not the local comprehensive plan filed with the state.

In the end, the Cooperative's goals and purposes can perhaps be best assessed by what it determined to put into practice. In Riverhill, that has meant providing services to the:

- Educable Mentally Retarded.
- Learning Disabled.
- Emotionally Disturbed
- Speech/Language Disabled.
- Trainable Mentally Retarded.
- Physically Handicapped.
- Severely Multiply Handicapped.
- Gifted.

These services have been provided by regular and special personnel including teachers, psychologists, occupational therapists, physical therapists, speech therapists, social workers, counselors, and coordinators. Specific programs in residence are provided for learning disabled, educable mentally retarded, emotionally disturbed, speech/language disabled, and gifted. Services for all other recipients are provided by contract with external agencies.

It is worth noting, finally, that while the services mentioned in the Agreement other than special education might in principle permit wide-ranging activities on the part of the Cooperative, in fact these other services--career education, media services, curriculum development, in-service staff training--are utilized almost exclusively in support of the special education function. While there are some exceptions, for example, in that the Careers Orientation Project carried on by the Cooperative also has utility for regular students, it seems clear that special education is the central purpose and other functions serve as handmaidens to it. The validity of this assertion will become evident below as these related activities are described.

The Structure of the Cooperative

The Riverhill County Educational Cooperative became effective in mid-1979. Legally, the Cooperative is a type empowered, as we noted above, to provide service not only in the area of special education, but in other areas as well--a provision that makes possible projecting, seeking funding for, and carrying out projects which are only indirectly related to classroom instruction of the exceptional student.

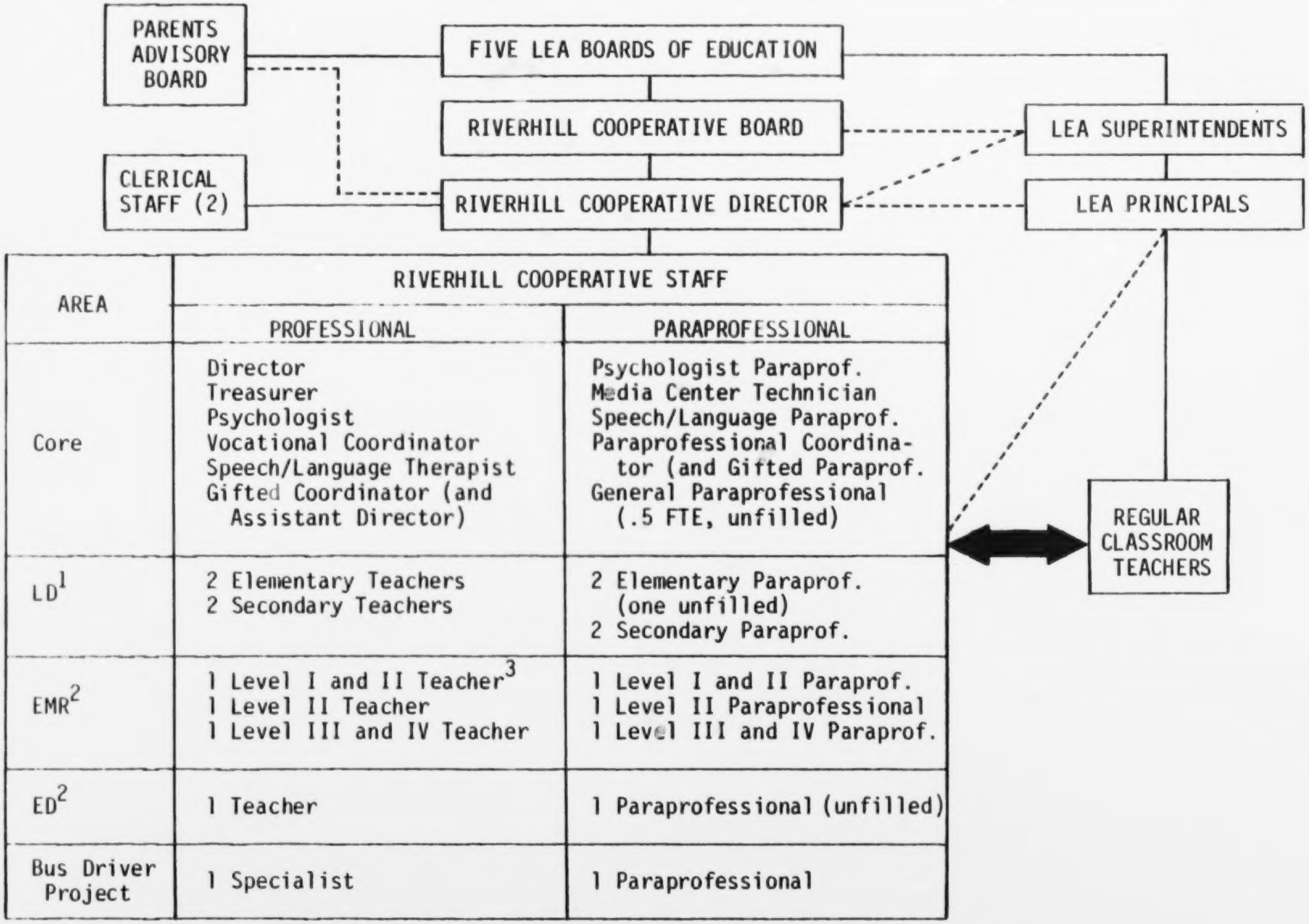
The Agreement establishing the Cooperative is an uncomplicated document providing only for the most obvious and salient matters. These include: the governance structure; the services provided (the two paragraphs dealing with this matter have already been cited; see p. 14 above); the term of the Agreement and provisions for renewal; fiscal details such as the formula for member local education agency (LEA) contributions, preparation of the budget, ownership of property and the processes for divestiture of property should the Cooperative not be renewed; procedures for rehiring personnel under contract to Teague because of its earlier role as "host agency" who will now be contracted directly by the Cooperative; a statement that the resolution of any problems by the Cooperative board will be binding on the member LEAs; means for modifying the Agreement (including the provise that changes recognize a unanimous vote of the members); retention of all powers to the Cooperative provided for under state law; a note that the Agreement will require approval by the state attorney general before becoming effective; and, finally, notice that the Agreement may be terminated at any time by actions of the state legislature. All these provisions required only eight double-spaced typewritten pages; the Agreement is simple, direct, minimal.

The overall organizational structure is depicted in Figure 2. The five LEA boards each name one regular and one alternate member to the Board of the Cooperative. LEA superintendents are designated as advisors to their district's representative, with authority to attend all monthly Board meetings and to counsel with the member on any matters that come before the Board--an arrangement which does little to encourage Board members to become expert in the Cooperative's problems but to rely instead on advice from the Superintendents. Of course it would be a mistake to regard the members of the governing board as mere puppets whose strings are pulled by the Superintendents, but it would be equally naive to suppose that the Superintendents' informed influence on board members is inconsequential.

The Board is responsible for naming the Director; following on the heart attack of the original director, the Board selected "one of their own"--a former superintendent of the Media district who had resigned to enter private business, but was willing to be "drafted" in the emergency. The Director supervises two clerical staff, 14 professionals and 13.5 paraprofessionals, all of whom are located within the county except one professional and one paraprofessional who are located at the site of another cooperative in the state with whom the Riverhill Cooperative operates a joint project (the Drivers for Special Buses Project; see below). The Director maintains liaison with the principals of each LEA school. The principals continue to be accountable for all operations within their buildings, putting the Cooperative teachers, whether itinerant or permanently assigned (e.g., in a self-contained EMR room), in the position of serving two masters. The Cooperative staff and the regular classroom teachers have a variety of relationships, which will be described in more detail below.

The Director also receives inputs from the Parents Advisory Board, consisting of 10 parents, two from each of the cooperating LEAs, which meets three or four times a year. The parents on the board are appointed by the school board of each LEA on nomination by the superintendent; it is unclear to what extent parent interests and concerns are actually represented. It is the case that parent advocacy or support groups have not sprung up spontaneously, so that it is probable that school board nomination may be the only feasible way to obtain parent inputs.

It seems likely that decisions about important matters are not made in open meetings of either of these Boards (Cooperative Board and Parent Advisory Council) but are simply ratified there. It was suggested by several informants that it was only on occasions when matters could not


PARENTS ADVISORY BOARD
FIVE LEA BOARDS OF EDUCATION
RIVERHILL COOPERATIVE BOARD
LEA SUPERINTENDENTS
CLERICAL STAFF (2)
RIVERHILL COOPERATIVE DIRECTOR
LEA PRINCIPALS
REGULAR CLASSROOM TEACHERS

AREA	RIVERHILL COOPERATIVE STAFF	
	PROFESSIONAL	PARAPROFESSIONAL
Core	Director Treasurer Psychologist Vocational Coordinator Speech/Language Therapist Gifted Coordinator (and Assistant Director)	Psychologist Paraprof. Media Center Technician Speech/Language Paraprof. Paraprofessional Coordinator (and Gifted Paraprof. General Paraprofessional (.5 FTE, unfilled)
LD[1]	2 Elementary Teachers 2 Secondary Teachers	2 Elementary Paraprof. (one unfilled) 2 Secondary Paraprof.
EMR[2]	1 Level I and II Teacher[3] 1 Level II Teacher 1 Level III and IV Teacher	1 Level I and II Paraprof. 1 Level II Paraprofessional 1 Level III and IV Paraprof.
ED[2]	1 Teacher	1 Paraprofessional (unfilled)
Bus Driver Project	1 Specialist	1 Paraprofessional

[1] Itinerant. [2] Self-contained. [3] Age grade levels, not disability levels; each level encompasses three grades.

FIGURE 2: ORGANIZATION OF THE RIVERHILL COUNTY EDUCATIONAL COOPERATIVE

be determined by the normal workings of the "good old boy" network that formal actions would be taken at open meetings.

Given the interlocking arrangements that have been noted--LEA boards appoint Superintendents and Cooperative Board members, as well as members of the Parent Council; the Cooperative Board appoints the Director; Superintendents sit as advisors to the Board Members--it would be naive indeed to imagine that all business is conducted formally and publicly. But, on the other hand, not too much evil intention should be read into these arrangements; we deal, in a rural community, with persons who know each other well, have many other contacts than those relating to Cooperative business, and operate within local mores and customs to which they were long ago socialized. What is likely to fall between the cracks in such an arrangement is new information that cannot be interpreted by the locals or that flies in the face of their belief systems.*

It should be noted, finally, that the Cooperative is perceived to provide both advantages and disadvantages to the local school districts. The major advantage, of course, and one that would no doubt result in a cooperative effort even in the absence of any other advantages, is simply that by joining, LEAs can provide a quality and scope of service to exceptional children that would be beyond their own means. It is the Cooperative, in effect, that permits the LEA to come into compliance with 94-142, and, in this case, the state's own legislative mandates. But membership provides more benefits than that. Since it moves the locus of activity from LEA to Cooperative, it also moves the responsibility for compliance. Accountability is shifted from superintendent to Cooperative Director. The Cooperative also assumes operational responsibility: it is now up to it to plan, program, schedule, implement, troubleshoot. Superintendents heave a collective sigh of relief to be rid of all those details, as well as of the burden of paperwork that is also lifted from their shoulders. Finally, it is advantageous to an LEA to have available by virtue of the Cooperative's existence a supply of consultant help for teachers who must service exceptional children in their classrooms under the mainstreaming concept; the ultimate responsibility for their success or failure with these children rests, to a considerable extent, with the resource teachers or teachers of self-contained special education rooms who are easily available for consultation.

There are of course off-setting disadvantages, at least as seen from the perspective of the local districts. There is, most importantly, a loss of autonomy and control. The local district is no longer able to determine exclusively whom to serve and how to do so. Principals remain in control of their buildings but must somehow accommodate itinerants or even permanently placed personnel who are responsible to some other authority as well. Boards and Superintendents lose a measure of fiscal control; they agree to absorb their percentage of Cooperative costs without knowing in advance what the costs will actually be (see below).

---

*The underlining of this paragraph indicates that it is interpretative material reflecting the opinion of the inquiry team. See p. v.

Some parents may feel disconnected from their children: when they have a complaint they do not know with whom to lodge it, and when they do know they sometimes find the person is relatively inaccessible in a schoolroom or office miles away. Teachers invade one-another's turf on a daily basis. Channels of communication become lengthened and distorted.

The Cooperative agreement contains procedures for extending the contract, with or without revisions, after its automatic termination in 1982. It reamins to be seen, as of this writing, whether the agreement will be preserved in its original form, or whether substantial changes will be made reflecting the three years of experience. In view of the problems that have been identified, it is hard to imagine that proposals for extension will not receive more intense scrutiny than did the original proposals.

The Targets for Cooperative Services

We have already seen that the Cooperative is committed in its statement of philosophy to "meet the provisions for exceptional children as set forth in legislative action by making a free and appropriate educational program available to each exceptional child regardless of the exceptionality." But a child must be identified before he or she can be served; what does the Cooperative do about that?

Children who are sufficiently within the "normal" range so as to be sent to school come under the surveillance of teachers and administrators who refer them for possible service. We have already commented on the fact that over the course of a school year children enrolled in LD and S/L programs grow in number precisely because these problems are so visible to professional personnel. Other children whose parents have taken them to private physicians, community health services, or other special care agencies are also likely to be referred to the school for attention. The school itself conducts annual hearing and vision tests to identify children with deficiencies in these areas.

These sorts of child locating procedures might be described as passive; the children come to the school's attention with virtually no special effort on the part of school personnel. But the Cooperative also engages in more active locating procedures. Bimonthly newsletters are sent to parents of handicapped youngsters and other patrons of the system to keep them apprised of opportunities for their children. Announcements are sent to area newspapers and radio stations to create awareness and encourage referrals. The Cooperative participates each year in the state-mandated and state-operated CATCHMENT LOCATER CLINIC. Unfortunately, this program generates a low response rate. A majority of cooperative personnel believe that the program is ineffective because it lacks scope and magnitude. Four neighboring cooperatives, of which Riverhill was one, wanted to join forces for child find purposes but were prohibited from doing so by the State Department of Education, for reasons that were unclear to the Cooperative staff.

There are a number of forces other than State Department of Education prohibitions against joint action that discourage the Cooperative (and other similar agencies) from becoming very active in early childhood locating procedures. While professional experts seem to agree that early identification and remediation are most desirable, the Cooperative is hardly motivated to act strenuously in that direction. First of all, the Cooperative cannot mount early childhood programs; such programs while authorized by the state are not mandated and therefore not funded. Second, numbers of agencies compete for those funds that might be available for early childhood education; Cooperative staff feel that these agencies (for example, United Cerebral Palsy, the state health department, the State Department of Education's special education division) are quick to seek available funds but equally quick to refer identified children back to the school system when such funds are in low supply. The Cooperative refers those young children which it does find to the local Head Start program; severe cases are referred to specialized agencies outside the county.

Those school-age children who are identified by whatever means are rapidly and expeditiously evaluated and placed. For example, during the first 36 days of the 1980-81 academic year, there were 64 referrals and 62 staffings, that is, sessions involving relevant personnel and parents to determine the disposition of individual cases. During the first month of that academic year the speech/language therapist conducted a total of 846 speech or hearing tests. All children who are identified are served in in-house programs or are referred to other agencies at which the Cooperative pays charges or tuition. The range of such services is summarized in Table 4.

Information gathered by the Cooperative with respect to its client group of children is of course confidential in accord with policies published on an annual basis. Records are kept both by the local district as well as the Cooperative. Requests to access the records must be made in writing except by those personnel who have direct responsibility for the child's program, who may consult them on a need-to-know basis. Parents or guardians may consult the records on request; however, no release of information will be made to them or to others without written authorization (except in certain cases such as court orders). Access to all records is logged.

In the event that parents or guardians object to information in the record, or wish to amend or otherwise cause it to be changed, they may make a request in writing, which is referred to the responsible staffing team. The decision of the staffing team is communicated to the parent or guardian. In the event that the parent or guardian disagrees with the staffing team's decision, a hearing may be requested.

The Cooperative Director reviews records on an annual basis. Those records which are no longer useful are destroyed after five years in accord with P.L. 93-380.

Cooperative Functions and Operations

It is time now to turn to the question of just what the Cooperative does--how it functions, and what mechanisms it employs to get things done. A variety of activities will be considered, including descriptions of how clients are processed, of programs and projects, of support services,

TABLE 4

SERVICES OFFERED TO EXCEPTIONAL CHILDREN BY THE COOPERATIVE

Program	Nature of Service
In-House	
Learning Disabled	2 elementary and 2 secondary teachers, 3 paraprofessionals, itinerant programs, all LEAs.
Educable Mentally Retarded	3 teachers at 4 age/grade levels, 3 paraprofessionals, self-contained rooms, 3 sites (Hillcrest, Media, Teague).#
Emotionally Disturbed	1 teacher, 1 paraprofessional, self-contained room, 1 site (Rivertown).*#
Speech/Language	1 therapist, 1 paraprofessional, itinerant, all LEAs.
Gifted	.5 FTE coordinator, .5 FTE paraprofessional, itinerant, all LEAs.
Vocational Services	1 vocational coordinator, itinerant, all LEAs.
Psychological Services	1 psychologist, 1 paraprofessional, itinerant, all LEAs.
Contracted	
Trainable Mentally Retarded	Contracted to neighboring county facility.
Severely Multiply Handicapped	Contracted to neighboring state family services center; severe cases to state university medical center.
Physically Handicapped	Contracted to neighboring state family services center; severe cases to state university medical center.
Vocational Education	EMR vocational program contracted to neighboring county area vocational school.

*Program suspended in 1981-82 because of the unexpected resignation of the ED teacher and paraprofessional.

#Students throughout county served at these sites.

of staff training activities, and of related activities including change, evaluation, due process, public relations, and politics.

Processing of Clients. When a pupil is referred for service, how does the Cooperative respond? How does it decide whether the pupil warrants service, and how does it determine what services to provide? An overview of the client processing steps is given in Figure 3, involving 14 steps ranging from initial referral to triennial re-evaluations. Each step is considered in the discussion that follows:

1. The child may be initially referred in a variety of ways. The most likely source is a teacher who sees the child on a daily basis, but referral may also come from a physician, a parent, a welfare agency, or any of a multitude of sources. Referral is formally made by filling out a "Request for Services Form" and sending it to the principal of the school which the child is attending or would normally attend.

2. The principal reviews the case as presented on the form; if the child is already in school the regular teacher of the child is involved in this review. If the principal is in agreement that the case is a valid referral, he signs the form and transmits it to the Cooperative's school psychologist for action.

3. The psychologist convenes a "Professional Planning Team" (PPT) to discuss the referral (a "referral staffing") and to determine if intervention is appropriate. The team is assembled ad hoc and typically consists of the principal, the referring teacher (if any), special education personnel, and any others deemed necessary in view of the case particulars.

If the PPT determines that intervention is unnecessary, the situation reverts to the status quo, although the PPT may make recommendations for "indirect intervention" to the teacher, ameliorative or supportive actions that are within the purview of the teacher to take in the normal classroom situation. For example, the teacher might be encouraged to follow through on some of the suggestions that the PPT would have recommended had the IEP been developed.

4. If intervention seems appropriate in the judgment of the PPT, two steps are taken. First, a "case coordinator" is named--a teacher, social worker, guidance counselor, or other person, who will be responsible for the case and handle logistical and other details. Second, parents are solicited for permission to begin a program of evaluation. A form, "Permission to Test," is mailed to them which specifies the reasons for the proposed comprehensive evaluation, indicates the types of instruments to be used and by whom, informs the parents of the confidentiality of the resulting information, and assures them that competent personnel will be available to interpret test results to them. The "tests" may include not only conventional paper-and-pencil or other standardized instruments but also family and/or child interviews, collection of work samples, classroom observations, and other more qualitative evidence. Simultaneously, parents are sent an information form, "Parental Rights in Special Education," which lists for them 47 "rights" under Federal and state law.

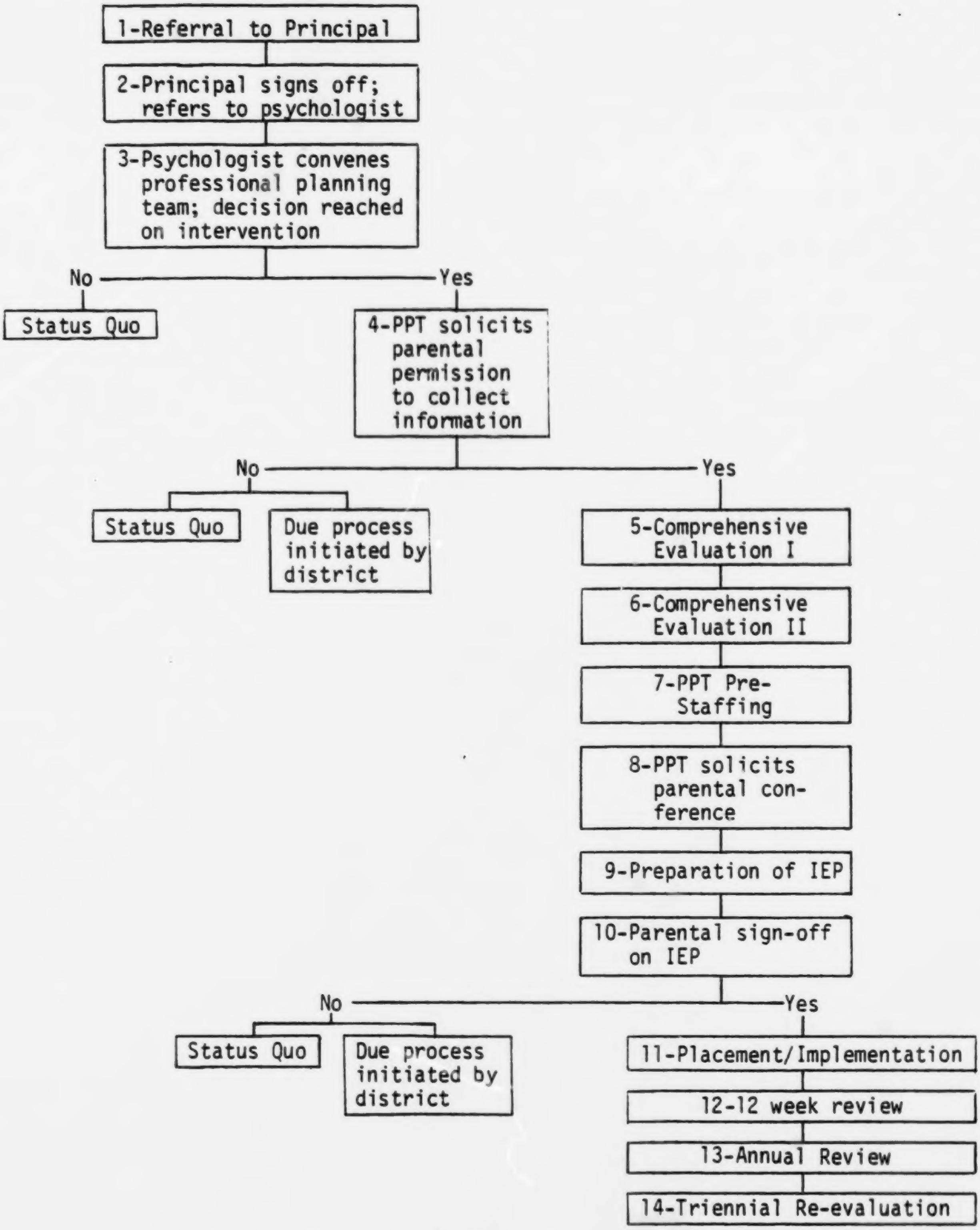

1-Referral to Principal
2-Principal signs off; refers to psychologist
3-Psychologist convenes professional planning team; decision reached on intervention
No
Yes
Status Quo
4-PPT solicits parental permission to collect information
No
Yes
Status Quo
Due process initiated by district
5-Comprehensive Evaluation I
6-Comprehensive Evaluation II
7-PPT Pre-Staffing
8-PPT solicits parental conference
9-Preparation of IEP
10-Parental sign-off on IEP
No
Yes
Status Quo
Due process initiated by district
11-Placement/Implementation
12-12 week review
13-Annual Review
14-Triennial Re-evaluation

FIGURE 3: FLOW CHART OF THE COOPERATIVE CLIENT PROCESSING STEPS

b. The child's teacher(s);
c. One or both of the child's parents;
d. The child where appropriate; and
e. Other individuals at the discretion of the parents or school.

This team carries out the pre-staffing (minus the parents) and participates in the formal IEP session (Step 8 below).

The placement and review PPT is mandated by Cooperative policy to attend to or provide the following information in making its determinations:

a. Present levels of educational performance;
b. Special education and related services needed without regard to availability;
c. Projected dates for initiation of services and the anticipated duration of services to be provided;
d. The extent to which the child will participate in regular educational programs or other less restricted environments;
e. Establish objective criteria and evaluation procedures through annual goals and short term objectives to be evaluated at least every 9 weeks;
f. List the names and positions of the individuals responsible for implementation; and
g. Provide the parents with a copy of the IEP at each evaluation period or upon request.

8. Having reviewed the information and prepared its recommendations in preliminary form, the PPT asks the school principal to set up a parental conference--the IEP staffing, which he normally does through the Cooperative. Parents are contacted in writing and invited to attend. While there have been no cases of parental refusal to date, if such refusal did occur, the Cooperative would take whatever steps seemed most appropriate to the child: to proceed to a hearing to determine if the child should be specially placed, or to revert to the status quo.

9. The IEP is formally ratified at the staffing session with the full PPT including parent(s) in attendance. Essentially this amounts to completing and signing off the "Cooperative Individual Educational Plan" form, which, in addition to personal identification data, includes a summary of performance capabilities, strengths and weaknesses in intellectual, academic, language, and "other" areas, together with recommendations for special services needed in respect to any of these; a notation of any "unique educational needs," e.g., a hearing aid; and the specification of annual goals ("The student will . . ."). Short term objectives covering at least the first nine weeks of time are also devised, and recorded on a second form, which also provides space for evaluation of their achievement.

Cooperative policy provides for certain roles and responsibilities for the various personnel involved. The Director is named as responsible for obtaining any recommended services not immediately available within the district or Cooperative. The special education teacher is responsible for recording agreed upon information on all forms, for meeting with the parent every nine weeks to review the objectives and to determine whether changes are necessary (a function for the entire PPT team if required), and to note all instances of parental involvement or input in the student folder. If at any time the teacher has been unsuccessful in three attempts to arrange a parental meeting, a copy of the IEP is mailed to the parents by Cooperative central staff for their inspection.

10. When the IEP staffing meeting is completed, parents are asked to sign-off the plan indicating their acceptance and granting permission to proceed. Parents who refuse are asked to sign a "Rejection of Services Form" instead to attest to their formal refusal.

11. If parents give their consent the program as outlined on the IEP is immediately put into effect; the child is placed as called for and instruction and/or therapy begin.

12. Short term objectives are reviewed every nine weeks. Evaluations are made diagnostically, checking such pre-established categories as "objective met as stated," "made progress," "no observable progress," "learning pre-requisite skills," "objective too difficult," and "student lost interest." Other comments may be inserted as appropriate. If wide-ranging changes in the IEP seem to be called for, the IEP may be referred back to the PPT and parents for reconsideration.

13. In similar fashion, the IEP is reviewed every 9 weeks as well as on an annual basis and revised if necessary by the PPT.

14. Complete re-evaluations of every serviced child are mandated every three years. The school psychologist is responsible for seeing to it that such re-evaluations are scheduled, and to stagger their scheduling in order to facilitate the logistics of the process.

All in all, the process as instituted by the Cooperative seems to be working reasonably well in the opinion of staff. Much credit is currently being given to the school psychologist, new to the cooperative in the Fall of 1981, who seems to have expedited matters greatly--although at no small cost in his own and other staff time. The significant lag between referral and final placement, occasioned by the large numbers of cases turned up by mass screening procedures, has been reduced to the order of six weeks. The prestaffing step seems to have eased the burden a great deal. But complaints continue about the "real" utility of the IEP process, and about the burden of paperwork which it imposes. More will be said of these matters later.

Programs. As we have already seen, the Cooperative provides a variety of programs, some in-house and some through contracts with other agencies. The contracted programs--trainable mentally retarded, severely multiply handicapped, and physically handicapped--are very small, serving a total of seven youngsters among them. These programs are all outside the county and the Cooperative's sole relationship to them is to refer students, organize the necessary transportation, and provide for tuition and other related costs. The other six programs, LD, EMR, S/L, ED, Gifted, and Vocational Education, will be described below. The latter program also has extensive contracted components.

1. The LD program. A total of 76 LD youngsters are served by the Cooperative, 53 at the secondary level (Grade 7+) and 23 at the elementary level. All of these pupils are mainstreamed in regular classes and serviced by itinerant LD teachers who work with them in small groups or one-on-one, removing them from their regular classes for approximately two hours (or two class periods) per week.

The LD program is operated by four LD teachers and three paraprofessionals. The two elementary LD teachers service about a dozen children each, spending about a half day in each district; the two secondary LD teachers service more than twice as many in the same time frame. Each teacher is assisted by a paraprofessional, except that the elementary teacher serving Hillcrest-Media-Teague is currently unassisted. In general, teachers and paraprofessionals interchange buildings, so that schools are covered by someone--teacher or paraprofessional--virtually all of the time. The teachers break new ground with pupils and do most of the direct teaching, while the paraprofessionals work with them in completing assignments made by the teacher.

The Cooperative staff are caught up in all of the national confusions about identifying LD students. Only about 20 percent of cases nominally labeled as LD come with a positive diagnosis of some handicap such as dyslexia (itself a slippery concept); the remainder are diagnosed mainly on the basis of achievement deficits and patent learning problems. Since for some children these difficulties may not be patent until the child has been in school for some period, LD cases tend to pile up at the secondary level. Unfortunately, by that time, or so the Cooperative staff has apparently concluded, it is too late to remediate; all that can be done is to help the child compensate for deficiencies that he or she will carry through life.

The program of the Cooperative has two thrusts. On the one hand, the LD teachers work with the pupils on a variety of learning strategies: time management, test-taking, note-taking, and the like, on the assumption that improvement in these areas will help them compensate for other deficiences. Second--and mainly, in Riverhill County--the LD teachers strive for simplification: giving tests orally, rewriting teachers' work sheets and instructions, using a simplified book covering the same content, or even rewriting assigned book chapters, all intended to simplify learning tasks for the LD student and increase his or her chances for doing satisfactory academic work. As one LD teacher suggested, the emphasis of the secondary LD program has shifted from academic to vocational/survival skills; her highest praise for the LD program was that it had succeeded as a motivator to stimulate LD students to enter vocational programs.

The LD students are served in a variety of ways. The main approach is by means of direct sessions with LD teachers or paraprofessionals. Students are excused from their regular rooms or classes to work with the LD staff in resource rooms or other spaces--library or study hall, for example. Pupils are taken out at times--arranged in advance with the regular teacher--when they will miss as little as possible: during "non-academic" times, or, when material is being covered in which the LD student is already deficient, or, at the secondary level, during study hall times. Removal is made as unobtrusive as possible in order to avoid stigmatizing the student, for example, by having him or her leave at the same time each day so that it becomes routine, by moving at recess, and the like. The LD teachers typically spend a good bit of their time in consultation with the regular teachers, discussing helpful techniques, providing or redeveloping suitable materials, and even suggesting objectives which the regular teacher can endeavor to accomplish with the pupils. In at least one school, the LD youngsters are mainstreamed into special sections of high enrollment courses (e.g., high school English) to which a variety of "problem children"--not only LD--are assigned; these sections are typically smaller and are taught by teachers with special interest in or empathy for LD children.

Numbers of problems emerge with respect to the LD program. Some are spawned by the fact that both teachers and paraprofessionals are itinerants --which is itself a direct consequence of rural facts of life: low incidence and great distances. Some LD teachers do not feel well-accepted in the schools--they are "merely" transients and not part of the school "family." They must report to the principal, if only informally, when they arrive--just one annoying aspect of the "two masters" syndrome. A great deal of time is lost in moving from one district to another--one teacher reports she has just an hour and a half to travel, eat lunch, and orient her paraprofessional --whom she "passes in the night," as it were. Itinerants are required to report to the Cooperative at Brookville once a week--which takes more time away from the "real" job. That time is not all lost, however, since the teacher's main store of materials is at Brookville; she would need to return there from time to time anyway since she cannot carry everything she might need at all times. The price paid for itinerancy in social, logistical, and energy terms is nevertheless quite high.

Other problems emerge once the itinerant LD teacher is actually inside a building. First, she must work around the schedules of the regular teachers and the pupils. The pupils are mainstreamed, and the LD work is an interuption to the normal classroom routine. It is important not to remove the pupil at a time when key subjects such as arithmetic are being dealt with. Moreover, it is crucial to fit into whatever plans the regular teacher may have in order to maintain good relationships as well as not to detract from the learning of the non-LD children in the class. In any event the child cannot be removed for too long a time--an hour is about the maximum. Detractors (including some of the regular teachers who feel their schedules ought not be interrupted) suggest that such a short period of time at best twice a week is hardly sufficient to do much about the child's problems. Both itinerant and regular teachers long for a "smooth day" without confusion either resents having schedules or activities interrupted by arbitrary actions of the other.

Removing the LD children for special work also brands them as "special" in a stigmatic sense. If professional adults have a difficult time explaining or understanding LD, one can only imagine what the other childrens' understandings must be. It is impossible to hide the fact that the LD child is different from his age/grade peers, and probably different in some pejorative sense. Thus the LD teacher must, in addition to treating the learning disability, also deal with the child's psychological problems.

Another serious problem faced by the LD itinerant is that of maintaining adequate relationships with the regular teachers of the children she serves. Simply finding time to communicate is difficult--in the elementary school the regular teacher must absent herself from the class, and in the secondary school the regular teacher may have to give up part of his or her only free period of the day. But more serious is the inevitable conflict over control, which most often comes to a head over the matter of grades--if this child is divided between two teachers, who determines what the child's grade is? Frequently unofficial "bargains" are struck between the two, such as that half the grade is determined by each, or that the LD teacher gives a grade in one subject--say, language--while the regular teacher gives the grade in another--say, math, although the LD teacher may be helping a child in both. Or the LD teacher may understand that while the child may be doing "A" work in terms of standards the LD teacher sets, the child may never receive a grade higher than a "C" from the regular teacher.

Finally, the LD teacher has the problem of maintaining an image of professional integrity. Her posture of helping the LD child compensate by reading test items to him or her, or of simplifying the language of work sheets, may in fact be misinterpreted. Regular teachers sometimes have difficulty in understanding learning disabilities, tending to think of these LD children as lazy, abetted in their attitude by the well-intentioned but somewhat misguided LD teacher. When one adds to these difficulties the fact that the LD teacher is an itinerant, not one of the school's regular family, suspicions are often confirmed in the minds of the regular teachers.

2. The EMR program. A total of 37 children is serviced in the EMR program by a staff of three teachers and three paraprofessionals. Instruction is carried out in self-contained classrooms, whose location is based largely on available space. Children are bussed to the locations in which they are served, unless they happen to be close-in residents of the district within which the facility is located. Instructional groupings are formed on age/grade bases; thus, Level I is equivalent to primary (1-3) elementary grades, Level II to intermediate (4-6) elementary grades, Level III to junior high school (7-9) grades, and Level IV to senior high school (10-12) grades. A combination Level I and II room is located at Teague; a Level II room at Hillcrest, and a combination Level III and IV room at Media. Virtually all Level IV students are bussed to a neighboring county to participate in a vocational education program (see below); the few that remain behind are served in concert with junior high level youngsters not yet eligible for vocational programs.

For the first several years of Cooperative operation, EMR and LD youngsters were served within so-called "Inter-related Learning Centers," which combined their instruction, but, according to the Local Comprehensive Plan, "population shifts" produced a sufficient imbalance that this service model was abandoned in favor of a self-contained categorical model for EMR youngsters and the itinerant delivery model for LD children.

There is a great deal of speculation about the "real" reasons for the shift. Local informants suggest that a few LD parents objected strenuously to having their children stigmatized by being "lumped" with EMR children.

It is of course not the case that EMR children are isolated from the rest of the school. All EMR pupils participate with age/grade peers in art, music, and physical education. In a few selected cases EMR pupils are released from the self-contained rooms to attend certain "academic" subjects in regular classrooms. Occasionally, a "regular" child may be sent from the regular classroom to a self-contained room for special help in some difficult area, an "informal" arrangement not officially recognized but which most are willing to accept on the assumption that a child may be helped.

The substance of the program seems to be very similar to that of EMR programs generally. The aim is to enable a child to cope with real-life situations, to learn to recognize and live with the consequences of one's own behavior, to assume responsibility for one's own life, to achieve fiscal independence including the ability to hold a job, and the like. In fact, most of the EMR students who experience the Cooperative program succeed reasonably well within those limits. Some hold jobs, some enter the military service, some marry.

As compared to LD teachers, the EMR teachers have few problems. They are not itinerant and so are relieved of many of the burdens outlined in the preceding section. They manage their own rooms as do the other teachers in the building; they feel a part of the school family; they receive comparatively little "outside" supervision. On the other hand, a few feel somewhat frustrated by their students' slow progress, by the infinite patience demanded of them, and by their inability to produce "breakthroughs."

The major problem associated with the EMR program seems to be that it stigmatizes the students who are assigned to it. They are labeled as "stupid" or "dunces" by many who apparently fail to understand the meaning of the EMR cateogrization. They are teased by "normal" children. The EMR label may continue in some cases to dominate their lives even after leaving school; some observers feel that it accounts for lower success in job placement at least as much as their presumed lesser ability.

3. The Speech/Language program. The speech/language program services 49 youngsters utilizing one full-time speech therapist and one paraprofessional. Both these staff members are itinerants and visit all of the schools of the county on a regular basis. The speech therapist operates a speech/language screening program at the beginning of each school year that reaches more than half the enrolled population of the five member LEAs; during the remainder of the year his time is taken up with making one-on-one diagnoses and carrying out remedial prescriptions. The paraprofessional assists by following through on the speech therapist's prescriptions for children.

The program is substantively conventional. The large majority of cases--about 70 percent--are articulation problems, with virtually all of the remainder being language problems. Occasionally a voice or fluency case is seen.

Since speech/language therapy is carried out in virtually all school systems nationwide by itinerant therapists, there is nothing unusual about the Cooperative case. The therapist moves through the schools on a regular schedule. He does not expect to be seen--nor is he seen--as a member of the school family; rather he is a specialist working from the Cooperative headquarters in Brookville. Beyond the fact that a student may be teased for stuttering or other speech anomalies, there is no particular stigma attached to being seen by the speech therapist. As with LD students, S/L clients are taken out of regular classes for speech therapy at times appropriate both to them and to their classroom teachers.

Students are admitted to and discharged from the program as the need arises, time is available on the therapist's schedule, and the pupil's problem is ameliorated. When students are to be given speech therapy, their parents are requested to sign off on a "Speech/Language Placement Form;" similarly, when therapy is judged to be complete, parents are asked to sign off on a "Speech/Language Dismissal Form."

4. The ED program. The saga of the Cooperative's Emotionally Disturbed program illustrates dramatically what can happen in a rural setting when a small number of children with a particular disability is combined with a severe teacher shortage.

ED is among the state mandated programs, but it was the last to get started in the county. Initial locater activities had identified only one child that could properly be labeled ED. While the Cooperative felt under no great compulsion to initiate a program, the Director nevertheless hired an ED teacher to plan and to do additional screening. Despite the fact that there are more than 60 ED programs in this state that have been unable to attract certified ED teachers, the Director was fortunate in persuading such a person (male) who, for personal reasons, wanted to live in Riverhill County, to accept the position.

Planning and screening got under way in the 1980-81 school year. Screening turned up four more candidates, and two additional candidates moved into the county. The mother of one of these latter children, a particularly knowledgeable person, negotiated with the school district for ED placement prior to moving in, and was assured that would happen. Meanwhile, the ED teacher proposed to the Cooperative that a two-level program be mounted, one elementary and one secondary, and that two teachers be hired to staff these classrooms. He himself did not wish to teach fulltime; he would, however, act as a continuing consultant to the teachers and as a substitute, when needed.

The Cooperative accepted the plan in principle but was unable to find the two teachers it called for. Indeed, the wife of the teacher already on board found Riverhill County unacceptable as a place to live, and that teacher left. Meanwhile, the districts in whose bounds ED children had been identified began to put pressure on the Cooperative to provide a program. Further, the mother of the child who had been assured ED placement when the family moved to Rivertown also placed extreme pressure on the Rivertown principal, going so far as to threaten court action.

It was clearly time to act. The Director entered into negotiations with the Rivertown board to provide and remodel a room for the program in that district. A deal was struck with the State Department of Education permitting the Cooperative to hire a non-certified teacher, provided that he or she would enroll in a graduate program leading to certification, that the number of children assigned to the program would be only half the number normally permitted under state regulations, and that the teacher be visited periodically by an ED consultant for monitoring and assistance purposes--not an unreasonable compromise.

The program was scheduled to get under way with the 1981-82 school year. Three of the seven ED candidates were slated to be placed, one of early high school age and the other two of late elementary age. The provisionally certified teacher (female) was supported by an ED paraprofessional (male). Rivertown was at work getting the facility ready for occupancy. All systems seemed to be "go."

The start was inauspicious. The formal opening of the room was delayed for a variety of reasons, as for example, that the carpet had not arrived. But finally, after some six weeks into the semester, the class was duly assembled. Within eight days it was disbanded.

Early on the oldest of the three students made threatening gestures to the teacher. She, inexperienced in the ways of ED youngsters, immediately requested the school principal (note tht she did not first contact the Cooperative) to remove the child from the class, indicating that she feared for her safety and would not teach the class so long as he was present. The principal pointed out that she had no basis for such a request and insisted that she take the child back into the class. When she refused, he recommended to the Director that her contract be voided. After a conference with the Director, the teacher resigned her post, citing as her reason that she had contacted the State Department of Education to check on her certification status and had been told that she was not legally certified. The ED paraprofessional also resigned. As a result, there was no ED program for the remainder of the year. Two of the children in the class were returned to regular classrooms, and the third was recommended for placement in a state residential program. The remaining four identified ED cases in the county likewise remain unserved. The parent of one of the returned children said she was terribly frustrated, wanted "to do right" by her child, and felt guilty about her inability to act.

The Cooperative has devised an approach to deal with the situation. The Director has determined to hire a regular teacher with at least 10 years of classroom experience, enroll her (the Director has a particular candidate in mind) in an ED certification program, have her observe in other ED classes elsewhere, and simultaneously, train her as a counselor. Once operational, the new program would not involve an actual classroom but would look like a "crisis intervention" program. The teacher would carefully chart the behavior of the identified ED youngsters, and when she sensed that they were in periods of emotional disturbance, pull them out of their classes for special attention. Support and assistance would be forthcoming from Cooperative supervisors.

It remains to be seen whether this strategy can be implemented at all, let alone be successful. There is some question whether such a program will be found responsive to the state mandate for ED. There is also the question of whether the State Department of Education will again "deal" with the Cooperative to make all this possible.

5. The Gifted program. The gifted program might well be labeled as the "program that nobody wanted," or, for that matter, wants. Mandated by state law, provisions (including funding) for the program are contained in the state's special education plan and carry all the weight of any program mounted for handicapped youngsters under P.L. 94-142.

The program has moved through several phases before arriving at its present form, in which 19 youngsters are served by a half-time Cooperative coordinator/consultant and a half-time paraprofessional. Its roots are found in a Title IV-C adoption/adaption grant of $2,500 that, during the 1978-79 school year and extending through calendar year 1979, was earmarked to "develop and design a delivery system for Project Talent"--the gifted program. Unfortunately, the persons responsible for the program resigned at the end of the school year, leaving the last three months of the grant period dangling, although the program was terminated. During 1979-80, the program was operated as a virtual sideline by the Director, who was untrained for the task. Beginning in the Fall of 1980, a trained professional and a paraprofessional were assigned to operate the program, but only on a half-time basis.

State guidelines provide minimal criteria which must be used in identifying and evaluating youngsters eligible to participate: teachers' evaluations, evidence of past accomplishments, and test scores, including a standing at the 97th percentile or better on a standardized intelligence test and at the 95th percentile or better on a standardized test of academic achievement. The school districts also utilize tests of creativity and cognitive style, self-concept scales, school sentiment scales, teacher and peer ratings, academic histories, and a student autobiography --all techniques selected and coordinated by the Cooperative. IEPs are generated for these gifted students in the same way as they are for other areas of exceptionality.

During the first year of operation, the gifted program engaged students in "Discovery Contracts," through which the gifted agreed to undertake individual projects presumed to meet program goals such as fostering self-directed learning, problem solving, leadership, and creative thinking. Students were often excused from regular classes to work on these projects, sometimes independently and sometimes under the supervision of the itinerant Cooperative consultant. In addition, students were often involved in tours and field trips.

There was, however, general dissatisfaction with the program. It was felt by some that the whole program was one "glorified field trip" that contributed little to the students' growth but did prevent them from participating in useful regular class activity. Some parents actually felt that their children were stigmatized by being labeled "gifted." Many regular classroom teachers who were expected to assist the gifted carry through their projects felt that they were being required to do extra work. A few students themselves felt the "contracts" required more of them than should be required. The superintendents became anxious to escape the bad image that was being created and lobbied the Cooperative to "get the program back into the classroom." The Cooperative was not successful in recruiting trained personnel to operate the program; had little budget for programming and materials, and for a time contented itself with untrained leadership.

Interest and commitment rapidly waned. The Cooperative cut back the personnel commitment to the program in 1981-82 to a half-time coordinator. The gifted program became the program that no one wanted--and most everyone hoped the state would get off their backs by removing the mandate.

6. The Vocational program. Unlike the five programs already discussed, the vocational program is not directed at a particular category of handicapped students but to all of them. Philosophically, the Cooperative takes the position that for most handicapped youngsters, vocational goals are more realistic than others, e.g., college preparation. Thus the Professional Planning Teams stress the delineation of vocational goals in the preparation of IEPs, and a great deal of attention is paid to carrying them out.

In specifying vocational goals, the PPT has essentially five placement options: in a work-study experience, in the sheltered workshop (this unit will be described in more detail below), in simulated job training, in the so-called VATSS (Vocational Assessment and Training for Special Students) program, and in the CETA youth program. While relationships with the local CETA administrators have been good, lack of CETA funds as well as the operation of political factors in the state have not made that option terribly viable. Two other options, simulated job training and the sheltered workshop (most often a post-school option for TMR students), are of only passing interest here. The other two deserve more extensive discussion.

Work-study experience has its roots in a project, "Special Career Needs," which was based on "Project Discovery" materials adopted by the Cooperative via the National Diffusion Network. Project Discovery development was funded by the then United States Office of Education and its evaluation reviewed and approved by that Office's Joint Dissemination and Review Panel. The project is described in the Department of Education publication Educational Programs that Work. Thus, the Cooperative adaptation represents one of the successful applications of a Federally funded project--an occurrence sufficiently rare as to warrant notice.

The Cooperative adaptation was made possible by a Federal grant of approximately $22,000. Initially, it was designed to provide work experience for EMR students at junior and senior high school levels. Local business and industry executives as well as farmers (noteworthy in a rural area) were solicited to provide opportunities for placement; a tax writeoff provided one incentive for participation. In 1981-82, the program was expanded to include all categories of exceptionality except gifted; currently the program serves about 60 students. A useful spinoff of the program is that it has increased community awareness of and empathy for problems of handicapped youth.

The other program, VATSS, provides an interesting example of cooperation with a vocational school located in an adjacent county which provides vocational training for youth for an entire region of the state. Handicapped students attend under contract with the Cooperative; non-handicapped students may attend under contract with the local school district. Under state law, school districts may receive vocational educational millage which they may use to mount vocational programs; most of the Riverhill districts operated their own programs until the regional school was opened. Now they send their students to the regional school, paying for them directly or through the Cooperative depending on whether they qualify as handicapped.

LD/EMR students who are 16 years of age and able to read minimal safety instructions are eligible to attend the school on a half-day basis, returning to the home school for regular classes in the afternoon. The vocational school teachers are responsible for carrying out IEP objectives relating to the vocational program, even though they are not directly involved in developing the IEP in the first place. The students are exposed to three "Sampler" courses of 5-6 weeks duration each, which are intended to provide exploratory experiences in three different vocational areas. If they are deemed successful and elect to continue, the handicapped students may then become full-time, regular vocational students, receiving a full year of training in the area judged to be most suited to their aptitude and interests. While at the area school, these students also have available a learning skills center (mathematics and reading) which is used primarily, although not exclusively, by VATSS students. The area school has on its staff a VATSS coordinator who maintains relations with the several sending districts and cooperatives (of which the Riverhill Cooperative is one).

At the Cooperative responsibility for all of these vocational programs rests with the vocational coordinator. She acts as liaison with the area vocational school, provides some direct instruction to students, works with the EMR teachers to provide backup to their vocational efforts, and coordinates vocational programs such as "Special Career Needs" as well as some non-vocational programs such as the Sexism project (see below).

Related Projects. The Cooperative is by no means limited to instructional programs. In this section we shall describe four other projects which are interesting examples of adaptation, cooperation, and creativity: the Careers Orientation Project, the Vocational Sexism Project, the Drivers for Special Buses Project, and the Sheltered Workshop.

1. The Careers Orientation Project. This project, supported with a Title IV-C grant of just under $12,000, is a second instance of the utilization by the Cooperative of materials available via the National Diffusion Network. The project has two components. First, the Cooperative undertook a local job survey in order to identify "locally available careers," jobs that students in Riverhill County schools might aspire to were they to continue living in the county. Information from this survey was then used to guide teachers in exploiting curriculum units available from the national project. Three levels of units had been developed by the originating agency: awareness/orientation units at the elementary

level, exploration/orientation units at the middle school/junior high level, and preparation/information units at the senior high school level. Fifty-one instructional modules are available for the first two levels and 30 for the latter.

What makes this project of special interest--and differentiates it from the Special Career Needs project described earlier--is the fact that these materials are useable with all students, including handicapped youngsters. Since the Careers Orientation Project is under the direct supervision of the Cooperative vocational coordinator, one can be sure that this possibility is being exploited. The special role of the Cooperative in contributing to the vocational education of all Riverhill County youngsters should not be overlooked, however.

2. The Vocational Sexism Project. This project is closely related to the Careers Orientation Project and the Special Career Needs Project in that it, like the others, is concerned with vocational education. However, the special focus of this project is to create awareness of opportunities available to both boys and girls in non-traditional vocational areas--areas that cut across "normal" sex lines. Materials for the project were obtained from the state office of the national LINK organization, a group similar to NDN but different in that while NDN disseminates project models, LINK disseminates project products, i.e., materials. Funding for this project is also provided under a Title IV-C grant. Again, the coordinator for this project is the Cooperative vocational coordinator, a fact that assures adequate exchange with other ongoing vocational efforts.

3. The Drivers for Special Buses Project. This training project for drivers of school buses transporting handicapped youngsters is a joint venture between the Riverhill Cooperative and another cooperative elsewhere in the state, with the involvement of still three other cooperatives. Another Title IV-C grant (over $100,000) provides the fiscal support.

The original idea developed as a result of a conversation between the Directors of the two cooperatives dealing with the fact that drivers of buses transporting handicapped children had special demands made on them for which they were untrained. An early intention for the project, therefore, was to design bus driver training "packets" and to organize and orient the members of a network of instructors who would use the packets in providing in-service training experiences for drivers. Later, a second and possibly more powerful idea emerged. Some handicapped children (in Riverhill County at least) spend approximately two hours riding the school bus every day, and that time is lost for instruction. Indeed, in a few cases, so much time is used in bus-riding that it is impossible to meet state mandated minimums of instructional time per day. Why not train bus drivers to provide instructional experiences en route, for example, by playing video tapes, linking up computer games, and the like? Indeed, the bus project became, in the minds of its developers, a means for experimenting with different kinds of equipment and related software to determine their relative effectiveness for bus-based instruction. It remains to be seen how this project will develop.

4. The Sheltered Workshop. The story of the sheltered workshop might well be entitled, "A Story of Collaboration to Provide Needed Services." Early on, the Director and the staff of the Cooperative realized that while their programs were doing much to service more seriously handicapped youngsters, once they had completed the program some had nowhere to go. The Director contacted a sheltered workshop operating in an adjacent two-county area under the auspices of the Association for Retarded Citizens (ARC) in the hope that some placements might be arranged there for persons from Riverhill County. The director of that other workshop suggested instead that Riverhill County develop its own workshop program, and assisted in obtaining a summer grant from the state to get started. The Cooperative approached the Riverhill County Commissioners with a request that they provide funds for the workshop operation, but the Commissioners were unable to respond at that moment because of the schedule of tax collections. Undaunted, the Director turned instead to CETA, which saw in the request an opportunity to provide placement for several of its management trainees. CETA not only assigned two trainees but also provided funds to remodel the building (immediately adjacent to and connected with the Cooperative building at Brookville) and to purchase some needed equipment. With the help of the adjoining county workshop, a contract was obtained to repack damaged food products, and thereby employment was guaranteed for seven workers. Since then, and with the continuing assistance of the neighboring director, other contracts have been let, including one to provide custodial services for the Riverhill Cooperative!

Nothing succeeds like success. The county commissioners were finally able to provide some support of their own. They paid for installing a gravel driveway to the building and provided the foundation for a loading dock. Best of all, they levied a one-mill tax to support the workshop in the future. The two CETA trainees, having completed their apprenticeship, have stayed on and form the permanent core supervisory staff.

The Cooperative hopes to expand the program to include older residents of the county who have been unable to find other employment. An effort to secure a Federal grant in support of such an expansion was aborted when Federal budget cuts eliminated the funding program. But there seems little doubt that the program will continue to exist in at least its present form, despite the fact that the project has never been grant-supported.

Support Services. The Cooperative provides very few services other than those included in the programs and projects described above. It has no responsibility for food services. Psychological services offered to youngsters are those available through the counselors in the buildings in which they attend school--although the advice of the school psychologist may be sought in "difficult cases" and he does participate in all evaluations. There are no family counseling or support services of any kind.

The single area in which the Cooperative is involved in support activities is transportation, but even here the burden is minimal. According to the Cooperative agreement, each of the member districts is responsible for providing transportation to the "attendance facility" to which each student is assigned. In practice, this means arranging for the transportation needs of the 37 EMR students who are the only ones transported to Cooperative program locations. Of course that produces some problems; at times students are transported from the home district to an intermediate district where they transfer to another bus, and hence, finally, to the actual facility, for such students the time spent on the bus may exceed an hour each way. But the average student spends only 45 minutes one way, not an unreasonable time, even in an urban area! In addition, some of the students must be transported to the adjacent county vocational school to participate in VATSS; these students are counted among the 37, however.

The Cooperative has three direct responsibilities with respect to transportation. First, it takes responsibility for bussing the seven students enrolled in TMR, PH, and SMH programs--although parents have the option of driving their own children to the assigned facility and receiving mileage reimbursements. Several of these children do spend large amounts of time on the bus. Second, the Cooperative is responsible for arranging transportation schedules--a feat of no small proportions when it is realized that each of the member districts operates on a distinctly different schedule and each is reluctant to make busses available for Cooperative purposes until all of the "regular" students have been taken care of. Finally, the Cooperative has taken on the responsibility of completing the paperwork needed for the 80 percent reimbursement offered by the state on transportation costs--a service much appreciated by the five superintendents.

Training. Provisions for training under Cooperative auspices (and included in the regular budget) fall into three categories: regular education personnel, Cooperative staff, and paraprofessionals. No training is provided for parents or community members, or for administrators except as noted below.

1. Regular teachers. The 1981-82 state plan is silent with respect to those provisions of P.L. 94-142 concerning the Comprehensive System of Personnel Development (CSPD) mandated to be developed and implemented by each state. However, a four-pronged teacher training approach is undertaken by the Cooperative. First, teacher contracts provide for reporting for service ten days prior to the actual opening of school; a portion of that ten-day period is normally utilized for the 2-day Riverhill County Educators meeting that includes teachers, administrators, and paraprofessionals. Topics are determined by a committee that canvasses teacher interests and sets meeting agendas. Usually some topics relevant to special education are included. Second, five additional in-service days are set aside during the course of the school year; programs for these are developed by a similar committee and may also be utilized for special education training. Third, the State Department of Education operates two 2-day workshops annually whose program emphases are largely determined by teacher responses to the Mann Generic Competency Inventory. The Cooperative pays a $25 reimbursement to those participating in these SEA workshops. Fourth, teachers are "urged" to attend courses offered by the Hillcrest Community College designed to be responsive to teacher in-service needs. Despite these arrangements, many teachers do not feel that their needs are being especially well met.

2. Cooperative staff. The staff of the Cooperative are also the recipients of in-service training. First, seven days spread over the school year are designated as "work days," or in-service days. Topics are selected for each in terms of need. In one instance, for example, the Cooperative staff was familiarized with a classroom management system called "Mastermod," because it was felt that familiarity with the system would facilitate the Special Education staffs' own work while also enabling them to teach it in turn to regular teachers. It was hoped that a "common communication system" might evolve which would enable better pinpointing of student needs and the development of more responsive remediation. Second, Cooperative staff are enabled and reimbursed for attendance at regional and national in-service seminars and workshops, for example, such as are offered by the International Reading Association and the Council for Exceptional Children. Finally, Cooperative staff are offered training by their own specialists, as for example, training of other staffers by the school psychologist on interpretation of standardized test scores. Cooperative staff feel somewhat more satisfied with the training opportunities afforded them than do regular teachers, but would also like to receive more, and more specific, training.

3. Paraprofessionals. Paraprofessionals are also subject to a variety of training requirements. First, each paraprofessional is issued a copy of the "Paraprofessional Handbook," which provides a variety of information ranging from such items as contract termination through caring for a sick child. The manual is self-instructional. Second, paraprofessionals, as has already been noted, attend the in-service meeting held prior to the opening of school, along with teachers and administrators. Third, one day per month is set aside for separate paraprofessional meetings on topics determined to be of high need. Finally, the State Department of Education through a special unit provides paraprofessional training workshops on an irregular basis; the Cooperative is reimbursed for the time spent at these meetings but is required to pay registration and transportation costs. There appears to be little evidence about the utility of these experiences for paraprofessionals.

Development and Change. Organizations in general--and cooperatives are no exception--are not prone to change unless there is some active force moving them in that direction. At the Cooperative that active force is the Director, who believes that facilitating useful change in the organization is one of his major responsibilities.

A need for change or futher development is likely to be sensed by the Director for any of several reasons. Perhaps the major reason is problems with current programs. Thus the Interrelated Learning Center serving both LD and EMR youngsters is found to be unsatisfactory and is replaced with an itinerant LD and a self-contained EMR model; pre-staffing emerges when IEP staffings are found to be cumbersome and embarrassing; the sheltered workshop is established when it is noted that certain graduates of programs have nowhere to go. Pressures from parents, board members, or school administration with respect to these problems provides an additional stimulus. A second major source is the existence of other projects that have had some measure of success in other similar settings; thus Special Career Needs, Careers Orientation, and Vocational Sexism are all projects that have well-developed precursors--and materials sources--elsewhere. Similarly, the secondary LD program in Riverhill is modeled on another project (Project MODE) developed elsewhere in the state. In other cases the Director himself generates the basic idea, as in the case of the bus driver project that emerged from a casual conversation with a fellow director from another cooperative. In still other cases teachers and other personnel in the system are encouraged--as through the State Department's mini-grant program--to formalize solutions to problems that they have devised for their own classrooms (Title IV-C funds from the Federal government flowing though the State Department).

The Director has some well developed contacts that he taps systematically for ideas. First, there are formal diffusion agencies like NDN and LINC, which the Director finds accessible, and whose materials he believes to have quality, transportability, and validity and which can call his attention to materials from all over the country. The Director also utilizes the various departments of the State Education Agency. He frequently turns to the state Special Education Administrators association, as well as to contacts he has made at the state universities. He also makes an effort to become a member of a variety of boards of trustees. "Get involved in everything and anything you can," he advises. "You meet fantastic people and the exchange of ideas is great." Even though many of these ideas are not on the head of special education, they can often by adapted. The Director has managed to be named to the boards of the state Paraprofessional Advisory Council, the state Mathematics/Science Advisory Board, the regional mental health board that services four counties (of which Riverhill is one), the regional Achievement Services Board, Blue Cross/ Blue Shield, the advisory board to the state's Title IV-C projects, and the VATSS advisory board, of which he is president. He also serves as the regional representative for the state education association (NEA affiliate) and as a linker for the state LINC agency.

When the Director has determined that some new unit or procedure is required, he typically moves through the following sequence of steps:

1. He calls the Cooperative staff together as a planning team.

2. He calls in a number of outside experts for advice.

3. He prepares a list of alternative procedures that might be useful.

4. He presents this list of alternatives individually to the five superintendents, with a recommendation.

5. When the superintendents have reached a decision, he presents the joint recommendation to the Board.

6. Typically the Board will adopt the joint recommendation, especially in view of the fact that the superintendents sit as ex officio members at Board meetings and serve as advisors to the members.

Although only three years old, the Cooperative has passed through a number of forms, with different programs and different operating procedures. Most of these changes have been documented in earlier sections of this case study.

Evaluation/Monitoring. Evaluation activities at the Cooperative take four forms: compliance reports, and evaluations of programs, staff, and funded projects.

The annual compliance report is filed by the Cooperative with the State Department of Education and is validated by a monitoring team both by checking against other documents filed by the Cooperative and by a site visit. The compliance form essentially requires a "Yes-No" checkoff of items that are specified for LEAs and cooperatives in the state plan. There is no hint of a quality assessment; so long as the mandated item is physically present, the Cooperative is found to be in compliance. A recent compliance report on which instances of non-compliance had been noted by the state monitors was examined by the case study team; many of the "non-compliance" notations had been found to be in error by the Director who was able to cite, in the margins, the titles and page numbers of documents in which the required information had in fact been provided.

A second form of evaluation, with five sub-types, has to do with the Cooperative program. The major type of program evaluation is based on evidence of student progress--achievement of the goals set in the IEPs. Virtually all of the evidence for progress comes from observations from teachers, parents, physicians, and so on. Another type of program evaluation is input from the governing Board--in the main, an informal assessment of the degree of responsiveness and support for the program displayed by the general population. Student follow-up is a third type of program evaluation, but few such data are available because there have been, to date, few graduates to follow up. Cost effectiveness data, a fourth type, are called for on a state form, but the Cooperative has been unable to complete this form because it does not maintain data on a cost-per-pupil basis. Finally, teachers fill out an annual report, which is the basis for compiling an end-of-year report for the SEA, but the data required are largely descriptive (numbers served, for example) rather than qualitative and judgmental.

A third form of evaluation has to do with staff. Both Cooperative teachers and paraprofessionals are evaluated in terms of a systematic procedure. A Teacher Evaluation form based on state-mandated requirements is utilized for this purpose which lists a variety of objectives to be accomplished. Within the broad rubric of "Classroom Performance," teachers are accountable for 22 objectives relating to instruction (e.g., "Enlists student input in determining classroom activities"), 16 related to classroom management (e.g., "Volunteers skills, services, and talents to tasks at hand"). An additional 28 objectives define the area, "External Classroom-Internal School Performance" (.e.g, "Informs parents of areas in which students need improvement"). Teachers are evaluated by their superiors twice a year during the first two years, once a year for the next two years, and at least once in every three years thereafter. Teachers are expected to select five objectives as "goals" during each evaluation period; the main feature of the evaluation summary is the judgment of whether these goals have been achieved. A large proportion of the objectives require, as an essential part of the rating process, a conference between evaluator and evaluatee, assuring that the evaluatee will be thoroughly aware of ratings made and reasons for them.

Paraprofessionals are rated monthly by supervising teachers on a special form which is discussed with them and which they must sign. This form provides for rating, on a five-point scale, eight "personality and character" items, four "punctuality and attendance" items, seven "execution of work" items, and seven "quality of work assisting the teacher" items.

A fourth form of evaluation has to do with funded projects. Each project proposal has an "evaluation" section; so for example, the vocational education project outlines an evaluation based on assessment of contextual, process, and product factors, while the bus project speaks of achievement of performance objectives, promising both formative and summative data. But these sections do not describe the evaluation that will actually be done or how it will be done.

On balance, one cannot be much impressed with the evaluation procedures either at the SEA or the Cooperative level. But the situation is not atypical and surely ought not to be charged off to the laziness or ineptitude of the involved personnel. Evaluation is a rapidly changing art which even its most competent practitioners do not pretend to have mastered. Nor are either Federal or state guidelines operationally adequate--they say, in effect, "Go and do a good evaluation." And to a large extent, evaluation (summative or impact) has become, nationally, a mere ceremonial dance, a charade, because its results so rarely are taken seriously enough to influence any decision. But, on the other side of the coin, it seems clear that evaluation (formative) procedures at the Cooperative and its corresponding SEA could be greatly improved, with substantial benefit to all.

Due Process/Parental Involvement. P.L. 94-142 requires that parents (or guardians; we will use the term "parents" to mean either) be involved in decisions about their exceptional children and be afforded due process should any disagreements occur. We have already seen how the Cooperative has set up the processing of clients (cf. pp. 18 *ff*): parents must give permission before evaluative data can be collected about a child (Step 4, Figure 3), must be invited to attend a staffing meeting (Step 8), must participate in the preparation of the IEP (Step 9), are asked to sign off on (signifying permission to implement) the IEP (Step 10), and are entitled to receive and review information about subsequent placements and reviews (Steps 11 through 14). A form, "Parental Rights in Special Education," is provided to the parents as part of Step 4. Parents are also guaranteed that information about the child will remain confidential; a variety of measures have been established to support that guarantee (see p. 16).

What we are concerned with here is the process that the Cooperative follows in the event, either, that the parent refuses to participate in this process or to sign off on it, or that as the result of a decision by either parent or school district, a due process hearing is held.

The parent receives (Step 4) a notification of a staffing to prepare an IEP. This notification is couched in "generally understandable language," indeed, in the "language of the home" should that not be English. The letter specifies other options considered for the child and rejected, and also calls attention to the fact that the parent has the right either to consent or object.

If no response is received to this letter, follow-up is made, first, by telephone, and then by is registered mail.

Should the parents still not respond, the IEP staffing proceeds without them. Immediately thereafter, a notification is sent which informs the parents of decisions made about the child, and again informs them of their right to request a hearing, to have a second, independent evaluation made, and to access any records that have been compiled. Parents are also informed about available sources of free or low-cost legal assistance. If, after 30 days, there has been no response, the IEP is implemented.

If parents refuse any of the steps of Figure 3, or if either the parent or the school district calls for a due process hearing, another series of steps is put into motion; these are summarized in Figure 4. Additional information about each step is given below:

1. The hearing may be initiated by either the parent or the school district. Note that it is the district, not the Cooperative, that initiates action.

2. An "impartial" hearing officer is appointed by the Board of the LEA. To assure impartiality, the hearing officer may not be a member of the Board, be responsible for having recommended the action on which the hearing is based, have a personal or professional conflict of interest, or be a member of the State Board of Education or any other board concerned with the education of the child.

3. The hearing officer is charged with carrying out certain prehearing duties. These include: verifying that the parents understand their rights to call for an independent evaluation, to retain counsel, to have access to records, to be present at the hearing, to receive and read any testimony given, to confront and cross-examine any witnesses, to present their own witnesses, to have the child testify on his or her own behalf, to object to the introduction of any previously undisclosed testimony, to have an orderly hearing, and to have an official record made of the proceedings. The hearing officer also has the responsibility for arranging for an interpreter or signer, if needed; to notify the parents of the time and place of the hearing at least 10 days in advance (and that time and place must be reasonably convenient for the parents); to obtain a summary of evidence to be presented and of witnesses to be called from both sides; to request the clerk of the district court to issue subpoenas if needed; to determine the wishes of the parents regarding the child's participation and whether the

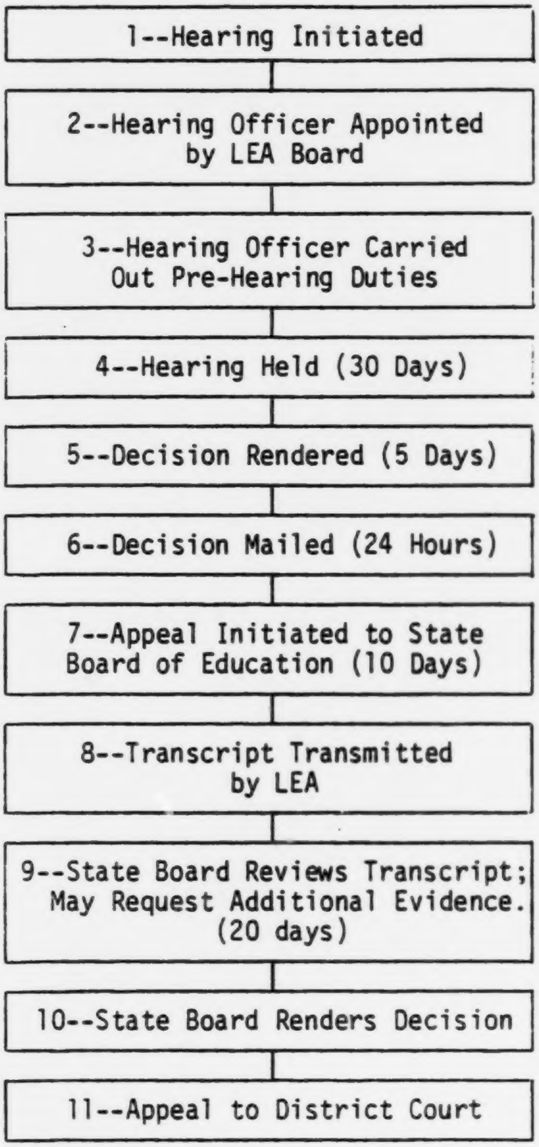

1--Hearing Initiated
2--Hearing Officer Appointed by LEA Board
3--Hearing Officer Carried Out Pre-Hearing Duties
4--Hearing Held (30 Days)
5--Decision Rendered (5 Days)
6--Decision Mailed (24 Hours)
7--Appeal Initiated to State Board of Education (10 Days)
8--Transcript Transmitted by LEA
9--State Board Reviews Transcript; May Request Additional Evidence. (20 days)
10--State Board Renders Decision
11--Appeal to District Court

FIGURE 4: FLOW CHART OF THE COOPERATIVE DUE PROCESS HEARING STEPS

hearing shall be open or closed, and to furnish the hearing agenda, at least five days in advance, and preferably at a pre-hearing clarification conference attended by both sides.

4. The hearing must occur within 30 days of receipt of initial notification by the parent.

5. The decision of the hearing officer must be reached within five days of the hearing's termination.

6. The decision must be mailed to the parties within 24 hours after having been reached.

7. An appeal may be made to the State Board of Education by either side, in writing, and within 10 days of receipt of the decision.

8. Immediately on notice that an appeal has ben filed, the school district must transmit to the State Board a full transcript of the hearing, together with any evidence collected at the time.

9. The State Board reviews the transcript and evidence; it may if it deems it necessary request additional information or evidence from either party. The review must be concluded within 20 days.

10. The State Board renders its decision.

11. Either side may appeal to the applicable district court. Thereafter normal legal processes are followed.

This elaborate process is established as official Cooperative policy because such a policy statement is required as part of the state plan. In fact, these steps have never been followed. Parents (including those of non-handicapped children) are, in the main, a passive lot; to them, the "school is the boss." Most tend to accept the judgment of the school's personnel, and the data of the evaluation, as gospel. Most parents tend to be positive about the pre-staffing which, although it limits their input at a vital decision-making point, streamlines the process, makes fewer demands on them, and obviates the long and painful process of generating objectives for the IEP. When parents refuse services, it is the policy of the Cooperative to accept their judgment, although continuing to use "gentle persuasion" to get them to "come around." There is also some reason to believe that most parents are ignorant of their rights or do not understand them despite repeated attempts to inform them; as a result, they are reluctant to press an issue because they are unsure of their ground. The elaborate instructions to the hearing officer are wasted unless a hearing is actually called; since this has never happened, parents have been unable to benefit from the officer's service (Step 3, Figure 4).

The elaborate plans devised by the Cooperative thus have never been tested, and may in reality be unnecessary. They would of course be essential should an appropriate contingency ever arise.

Public Relations/Communications. Public relations, or communication with the community, is largely informal in Riverhill County. There may from time to time to be a radio or newspaper announcement, as for example, in relation to the annual locator effort, or, a feature story about some aspect of the Cooperative's program, for example, participation in the Special Olympics. But in the main, the Cooperative depends upon two bodies, the governing Board and the Parent Advisory Council, to maintain lines of communication with the citizenry.

Members of the governing Board are appointed by the member LEA school boards. Virtually all of them see their function not as making policy decisions but as "watching out for the district's interests." Nevertheless, the Director characterizes them as "good links to the community," that are useful particularly to "dispel myths and rumors." The extent to which Board members play this role proactively or merely reactively is not clear.

The members of the Parent Advisory Council are also appointed by the LEA boards--two representatives per district. While there is no doubt that they represent parent positions to the Cooperative, their main function is to serve a public relations role with the community. They are sometimes enlisted in the game of "friendly persuasion" mentioned earlier--persuading parents reluctant to endorse special services for their youngsters to do so nevertheless. To a lesser extent than Board members, they also operate to dispel myths and rumors and to promulgate "official" information.

It is not surprising, given the lack of a formal and hard-working public relations mechanism, that informants should characterize the community's level of awareness as low. Most of the decisions and actions are politically mediated (reflect again, for example, on the interlocking interests represented when LEA boards appoint superintendents, Cooperative Board members, and Parent Advisory Council members; superintendents sit ex officio on the Cooperative Board; the Cooperative Board names the Director; the incumbent Director was formerly superintendent of a member LEA).

This situation is not necessarily bad, nor is it by any means atypical. Given strong traditions of local autonomy and rural circumstances in which virtually everyone is well known--and trusted--by everyone else, such intimate networks are the rule and not the exception. But of course the status quo is thereby supported; it is possible that a transient parent, an ethnically different child, an unusual problem, may be unfairly or ineffectively dealt with, however well the system may work under "normal" circumstances. On the other hand, it is also true that "new" people are easier to identify and help than "old". The latter outcome seems more probable than the former in Riverhill County.

Managing Political Factors. The management of political factors is a Cooperative function which is entirely in the hands of the Director, and carried out by him both informally and formally.

Locally, we have seen that the interlocking nature of various boards and offices virtually guarantees that decisions and actions will be politically mediated. The Director is the key person in managing these mediations, and he does so with skill and patience. Every decision to come before the Board is first checked individually with each of the five superintendents; their support can be counted upon before the matter reaches a voting stage. The Director also devotes a great deal of time and energy to "showing the flag," making an effort (not always successful) to visit each superintendent *and* principal in his office on a weekly basis for, as he describes it, "coffee and a chat."

At the state level, management of politics means two things: staying "in compliance," and "keeping in touch." Both demand close communication with key figures in the state capitol. The question of what will be interpreted as "in compliance" is answered by determining what interpretations will be placed on the many, often ambiguous, Federal and state guidelines. Often a simple consideration like using the language that monitors want to hear (the "official" language) is sufficient to avoid a non-compliance finding; it's important to keep up on those "simple" considerations. The Director makes numbers of visits to the State Department of Education, and while there, touches base not only with the personnel of the special education division but those in other divisions as well. Another way to keep in touch is to be a part of a variety of decision-making bodies in the state; we have already reviewed the Director's broad-ranging memberships on key boards (p. 36).

National level political factors are hardly ever heard of in the Cooperative. Whatever factors exist nationally are communicated to the Cooperative via state officials; they are screened through their perceptual apparatus. Local cooperatives, in whatever state they may be found, do not pay much attention to Washington; their accountability channels run through the state government. Riverhill is no exception. It is an illustration of the fact that while the most pervasive policies are made in Washington, and the persons who can alter those policies also sit there, local agencies like the Cooperative are out of contact with them.

Facilities

The facilities of the Riverhill County Educational Cooperative in Brookville are hardly arresting. The central office is housed in a turn-of-the-century elementary school building of a half-dozen rooms, into which the Cooperative moved following the construction of the Media complex, which consolidated several tiny schools of which Brookville was one. The facility has been minimally remodeled to provide private offices for the Director and the school psychologist, and work spaces for the largely itinerant gifted coordinator (who doubles as assistant director), vocational coordinator, speech therapist, four LD teachers, and the paraprofessional coordinator. In addition, the Cooperative treasurer and two clerical personnel are accommodated. A large conference/board room, which also houses the word processor and copying machine, completes the upstairs workspace.

Connected to the back of the building is the sheltered workshop, resembling a World War II Quonset hut. While the basement has been partly finished to produce a "playroom" to which children can be brought for various purposes, e.g., testing; a kitchen area in which staff can prepare coffee and store lunches; and the Media Center. Brookville itself is hardly recognizeable as a town. The Cooperative building is about a block from the town's "center," bordered by a partially gravelled parking lot in which, during the day, the Cooperative's small bus is parked. Staffers tend to "brown bag"; the nearest restaurant, or more properly, cafe, is in Teague, six miles away.

Nevertheless, during the work day, this facility is buzzing with activity. Permanently assigned personnel come early and stay late. Itinerant teachers move in and out to secure materials and make reports. Parents and children come and go. State monitors arrive to check books and make visual inspections. Employees of the sheltered workshop stop to chat on the way to restrooms. Over coffee professional personnel "informally staff" a case or seek one another's advice about a problem.

The Media Center, housed in the basement of the Brookville building, is a minimal and largely fortuitous collection of film projectors, TV receivers, books, games, diagnostic devices--all the usual accoutrements of such a facility--obtained mainly through project fund purchases. It is presided over by a paraprofessional who shares this task with that of driving the Cooperative bus. Her role is mainly checkout clerk--she is not sufficiently knowledgeable about the collection or competent in the use of the materials to provide any real consultant assistance to the staff. The combination of minimal materials and untrained staff render the facility minimally useful. But of course such problems are not unsolvable--they remain unsolved only because of lack of funds, not because of disinterest.

The small bus is the only form of transportation owned outright by the Cooperative. As we have seen, transportation for virtually all of the Cooperative clients is provided by the home district. The few TMR, PH, and SMH students served by the Cooperative are, however, bussed to an appropriate facility in an adjacent county. This bus provides that transportation, and it is driven by the same paraprofessional who otherwise is in charge of the Media Center. Itinerant staff drive their own automobiles as they move from school to school; they are reimbursed for mileage, although, as they quickly testify, at a loss.

Teachers on the Cooperative staff conduct their business in resource rooms. These rooms are whatever facilities local districts have found it possible to make available. Three such resource rooms are self-contained classrooms to which EMR classes are assigned--elementary rooms at Hillcrest and Teague and a secondary room (housing both Level III and IV students) at Media; these rooms are reasonably well stocked with materials appropriate to the teaching that goes on there. But these rooms are *also* used by itinerants; it sometimes happens that two levels of EMR students, the speech therapist working one-on-one with a client, and the elementary and secondary LD teachers working one-on-one with *their* clients, may all be in the same room at the same time. In buildings that do not house EMR rooms, the itinerants may have offices permanently assigned to their use, as in the case of the elementary and secondary LD teachers serving Rivertown, but in other cases they use classrooms, the library, the teachers' lounge, the cafeteria, or any other space that happens to be available. Even when permanent facilities are assigned, they are the "leftovers" after "regular" needs have been met. One teacher described the assigned room as a "sacred cow, one used as the concession stand for sporting events." Moreover, the degree to which these rooms have been renovated to their new use depends on the degree of fiscal solvency of the host LEA. As one principal put it, "Some people say that with the right approach you could teach in a barn. Then sometimes one doesn't have even the barn."

Professional Staff

The total professional staff of the Cooperative consists of 14 persons: the Director, school psychologist, speech therapist, vocational coordinator, gifted coordinator (and assistant director), four LD itinerant teachers, three EMR self-contained teachers, one ED teacher (a vacant position), and one developmental/instructional specialist for the bus project, hired and paid by the Cooperative but located physically at the facility of the other involved cooperative. These personnel are hard to come by and harder to keep. As the Director puts it, "I can't get 'em and I can't keep 'em!" Recruitment and retention pose difficult problems in rural areas.

There are many reasons, shared by a majority of Cooperative staff, why teachers might prefer not to come to Riverhill. Salaries are low and so are increments; one starts behind and gets further behind with each passing year. Riverhill is, moreover, on the state border--and the other state has both a higher salary scale and lower certification requirements. Teachers who do come to Riverhill can look forward to an abbreviated social life, lived in a fishbowl. There are value system conflicts; as one respondent put it, "You can't just live with someone here." Finally, Riverhill is in the unfortunate position that, while essentially rural, it is sufficiently close to both big cities and more attractive towns that teachers may elect to come there only as a lesser choice.

Those teachers who do come may not stay long. They find the schools are small; the paperwork burden high; the travel (even if assigned to a self-contained room) exhausting; the lack of respect frustrating; the lack of privacy annoying. They burn out; they have offers of better jobs (especially now that they have gained experience); their spouses are transferred. Those who remain work out special coping strategies: they live elsewhere and commute even further (across the river, say); they "pal around together" and shut out community influences; they leave on weekends; they develop other interests such as church activities to keep themselves occupied.

The Director has developed some interesting strategies by which to do his own coping--and to keep the Cooperative afloat. He looks for people trying to "break into" special education but who are not fully trained for it; he manages to get certification waivers for them, apprentices them in classrooms, and enrolls them in certification programs in nearby universities. Given the recent experience with the ED program, however, he ruefully admits that this strategy is not likely to tempt him again in the future, that despite the fact that other teachers hired on certification waivers have nevertheless performe adequately. He provides an annual $400 "personal budget" for teachers to spend professionally. He looks for persons who by background or interest fit into the rural way of life--even to the extent of persuading the wives of local farmers to consider training. But his major strategy, he suggests, is to "recycle," to find persons who have grown tired of what they are now doing and to challenge them to work in the Cooperative. He confronts them with "significant emotional events" (intellectual and practical challenges) that "turn them on." In some cases he asks them to serve in dual roles, to lessen the possibility of burnout in any one and to provide some change of pace. It is to the Director's credit that despite all of these difficulties, he has managed to recruit and retain personnel who could compete favorably in most settings. They are not "culls" but competent and resourceful professionals.

Despite these difficulties the personnel on board are qualified to perform their assigned tasks. The Director is, as we have seen, a former school administrator who holds a superintendent's license. The school psychologist and the speech therapist hold the certification for their roles. All other personnel are teachers with professional licenses; with the exception of the ED teacher of such brief tenure, none are on certification waiver.

Professional staff are provided in-service training (see pp. 34 ff.), are encouraged to acquire additional training by taking courses in nearby state universities, and to apply for Special Education Traineeships funded Federally via the State Department of Education. Nevertheless, some outstanding training needs remain unsatisfied, especially, according to the Director, programs aimed at "attitudinal change" that take account of rural concerns, and programs on "how to be an itinerant," a contingency not covered in the training programs of even fully prepared teachers.

Eight of the Cooperative staff are itinerants, although there are three different patterns of itinerancy. The school psychologist is in the schools on an ad hoc basis, testing children, meeting with Professional Planning Teams in pre-staffing sessions or to develop IEPs, and the like. The Gifted Coordinator and Vocational Coordinator, while sometimes working one-on-one with children, spend much of their time in resource or consultant roles to regular classroom teachers. The speech therapist and the four LD teachers work primarily in one-on-one or small group situations with pupils whom they see on a more or less regular schedule.

These itinerant teachers speak freely about the "stigma" of being an itinerant--and there appear to be some major drawbacks to the position. They see children sporadically and perhaps too briefly to do an adequate job with them. They are not easily accessible to concerned parents, nor are the parents easily accessible to them. They spend large portions of time and energy driving from one school to another--ten percent road time is a rather minimal estimate--and that doesn't count home-to-school time. While they are reimbursed for mileage, the reimbursement does not equal actual expenditure. There are even hidden costs such as increased insurance premiums for the distances driven. They are pressed into service as mesengers between schools. Worst of all, they have no home base. Every building they enter is someone else's turf; each building has its own "boss," and that boss has as much authority over the itinerant as does the Cooperative Director. Itinerants complain that too large a proportion of time in each building must be taken up in "PR" work, communicating with, explaining to, mollifying, helping the permanent personnel. The penalty for not doing that is psychological lockout and non-cooperation.

The EMR teachers who are assigned to self-contained classrooms have their problems of relationship too. While more likely to be accepted as one of the local "family," they nevertheless also suffer two masters. It is Cooperative policy that the EMR teachers shall "service the principal's preferences," even to the extent of performing lunchroom or playground duty if called upon to do so. Regular teachers feel free to use them as resource teachers, consultants, and even as providers of direct service to their own youngsters.

With few exceptions (one elementary LD teacher and the vocational coordinator), each of the Cooperative professionals has a paraprofessional assistant. More will be said about how these two persons relate in the following section; let it be noted here, however, that while the paraprofessional is clearly a major aid to the professional, he or she also requires supervision. This task taxes the professional staff even further.

It should not be assumed from this account, however, that the Cooperative staff suffer from low morale or feel especially put upon. Perhaps because of the Director's policy of providing everyone with a challenge, perhaps because of their own dedication, or perhaps because things are not so bad in practice as they seem to be in description, these teachers and other personnel by and large enjoy their jobs.

Paraprofessional Staff

The Cooperative has budget lines for 13.5 FTE paraprofessionals, although during the 1981-82 school year 2.5 were unfilled. Four full-time and one half-time positions are assigned to the central office: psychologist, speech/language, media center coordinator/bus driver, paraprofessional coordinator/gifted, and general paraprofessional (half-time, unfilled). Six paraprofessionals are assigned to classroom duty: three L.D. paraprofessionals who are itinerant, and three EMR paraprofessionals assigned to self-contained classrooms. One additional L.D. position is authorized but unfilled, as is an ED position. Finally, a paraprofessional is assigned in support of the developmental/instructional specialist employed for the bus driver training project; she is, however, assigned to the project facility in the other involved cooperative.

The problem of recruitment and retention is relatively minor for paraprofessionals, in contrast to teachers. There are virtually no prerequisites except state registration, although by Cooperative policy high school graduates and residents of Riverhill County are preferred. Hillcrest Community College now offers an associate level degree for paraprofessionals, largely because the Cooperative Director offered a variety of inducements--ready-made enrollment, volunteer instructional staff, among others--in order to persuade the college administration of the feasibility of the program. The program feeds not only into the Cooperative but into the regular teacher aide program found in the Riverhill County--and other--LEAs. Since the paraprofessional positions are filled primarily by local residents, a great deal of status is attached in the community to incumbency.

In fact, wages and working conditions are quite satisfactory. Para-professionals are paid by the hour--from a low of $2.90 to a high of $7.00, depending on the years of service and the number of in-service training hours accumulated. Salaries for a 35-hour week, for the school year, can be as high as $8,820. In addition, paraprofessionals are members of the state retirement system, eligible for group insurance, receive a 5-day sick leave allowance, and are reimbursed for travel mileage. They are also covered by liability insurance should they have an accident while driving a child on school business.

The role of the paraprofessional is, according to the Paraprofessional Handbook, to "assist and support the teacher, but . . . not assume the primary responsibility for the classroom." Among other authorized duties are these:

1. Assist or directly carry out educational activities designed by the director.
2. Work with individual pupils.
3. Work with small groups.
4. Drill the entire class on follow-up or reinforcement activities.
5. Assist in duplicating materials for the instructor to use in the classroom.
6. Correct papers and check the work of students.
7. Assist with classroom housekeeping chores.
8. Prepare instructional aids, games, and bulletin boards at the discretion of the instructor.
9. Perform various clerical duties within the classroom.
10. Supervise students on buses and at dismissal and on field trips.
11. Supervise job training.
12. Assist in carrying out programs set up by support personnel (OT, PT, speech).

In fact, paraprofessionals also act as an important link to the community, and serve as advocates for the children. Many parents will approach paraprofessionals when they would not think it appropriate to deal directly with teachers. Similarly, children will often expose problems or concerns to the less-threatening paraprofessional, who can then intercede with the teacher or act as advocate for the child.

A very few view the paraprofessional role with cynicism, believing it to be the state's cheap and inadequate answer to the sudden demand for services for the handicapped. They point out that paraprofessional wages are very significantly less than teachers' salaries. Moreover, the fact that the state will reimburse the local district in the amount of $4,030 for each authorized paraprofessional is seen as an attempt to encourage widespread utilization, thereby reducing available teacher positions.

As we have already noted (p. 35), a great effort is made to provide in-service training for the paraprofessionals. They, furthermore, have a great incentive to participate fully in such instruction because accumulated hours of training substantially determine the hourly wages that are earned. Thus a paraprofessional with no classroom experience but with the maximum number of training hours noted in the salary scale (1,860) earns as much per hour ($5.50) as the paraprofessional with six years of experience but only the minimum hours of training (20).

Paraprofessionals are asked to work closely with their supervising teachers; indeed, the Paraprofessional Handbook suggests that there be daily communication, problems be discussed as soon as they arise, initiative be taken, and that, above all, the paraprofessional should be a "team worker." In fact, the paraprofessional's performance is likely to be determined almost entirely by the expectations that the supervising teacher holds. If the teacher only rarely requires any thought or initiative, the paraprofessional is likely to perform at minimal levels. On the other hand, if the paraprofessional is constantly challenged with provocative assignments, it will be difficult for the casual observer to tell which is teacher and which paraprofessional. Indeed, several of the principals make that precise observation about the best paraprofessionals.

Two comments may be made about the ways in which supervising teachers and paraprofessionals interact. First, supervisors are required to evaluate the paraprofessional for whom they are responsible on a monthly basis (see p. 38). Through this interaction the paraprofessional quickly comes to know just what form of behavior to exhibit to receive good ratings--and that may range from servility to creativity. Second, only the EMR supervisors are in constant touch with their paraprofessionals; all others are itinerant and typically carry out functions at some distance removed from the supervisor. We have seen, for example, that LD teachers and their paraprofessionals typically trade-off buildings, so that they may encounter one another only in passing and have only the briefest opportunity to discuss what they are doing. Often that discussion is limited simply to the giving of directions--"This afternoon drill Johnny on the materials on p. 19 of the book he's working on." In the latter cases the paraprofessional must be capable of much more independent, and dependable, activity.

On balance, most informants indicate that the use of paraprofessionals in Riverhill County has been quite successful. Most agree they are doing a useful job and doing it well. They function in important formal and informal roles, and in this setting, where special education teachers are so difficult to recruit and retain, they provide a pool of stable and committed personnel that can be counted on to provide needed countinuity for the program.

Funding

The Riverhill County Educational Cooperative is funded through three main sources: state reimbursements, including P.L. 94-142 Federal flow-through funds; billings to the member LEAs on an equal-share basis; and project budgets, largely Title IV-C funds. The first two may be thought of as "hard," available, although with some negotiation, on a year-to-year basis, while the latter is "soft," subject to dramatic changes from year to year depending on the Cooperative's success in the entrepreneurial market.

Considering the latter first, income from project budgets is by no means an insignificant portion of the Cooperative's operating capital. So for example, the Careers Orientation Project was funded at just under $12,000; the Special Career Needs Project at about $22,000; the Vocational Education Project at about $24,000; and the Drivers for Special Buses Grant at over $100,000! The particular impact of the latter grant can best be understood by pointing out that during 1981-82, the Director was appointed to the project for .5 FTE; that is, half his salary was drawn from this account, and of course, half his time was devoted to project activity. Some of the Cooperative staff, as well as some of the superintendents, feel that this commitment is too great; that the Director is deflected from carrying out his "real" role as Cooperative leader. Too, some of his duties had to be delegated elsewhere, and no doubt the load of some persons was increased as a result without concomitant recognition.

Not only does the actual discharge of duties connected with funded projects take time, considerable effort must also be invested in obtaining them in the first place. The Director asserts that in this state one gets IV-C grants by "knowing people and networking," by "backscratching." He suggests, "It's the rural way of doing things--neighboring." He says, by way of metaphor, that it's much like "putting up hay." One farmer may have 10 acres in hay and his neighbor 20, but both get together and do both fields, not too much concerned that the contribution may be uneven. This way of viewing the world has implications for the fact that the five member LEAs determined, initially at least, to fund the Cooperative on an equal-share basis, as we shall see.

The state's contribution is set by law; indeed, in this state, support of special education excess costs has been mandated since 1951. Essentially this support is determined by the number of "program units" which an LEA can claim. The "program unit" is defined as teacher (or paraprofessional) clock-hours; 1,080 hours of a special teacher's time is counted as a program unit, while the same amount of paraprofessional time counts as a half-unit. A "special teacher" is a certified teacher of special education such as LD or EMR; a support person certified by the State Board of Education such as a school psychologist; a support person certified by a licensing or registering agency such as an occupational or physical therapist; or any other person approved on an individual basis by the Special Education Administration Section of the State Education Agency, for example, an adaptive physical education specialist. A paraprofessional is any person approved (certified) by the State Board of Education for that role. In 1981-82, the state reimbursement within this category was $8,060 per special teacher and $4,030 per paraprofessional.

The state in addition reimburses a portion of transportation costs. The travel of itinerant teachers, the cost of transporting special education students to instructional sites, and certain other transportation expenditures are reimbursible at 80 percent of actual outlays.

Personnel and transportation reimbursement requests are made three times annually on forms provided by the state. The first two payments, made in the Fall and at mid-year, are projected amounts based on estimates; the final payment is made on actual personnel and transportation costs and includes adjustments from the earlier estimated figures. All reports are subject to later audits as a result of which further adjustments can be made.

Several other comments should be made to place the reimbursement picture into context. First, the state presumes, as the basis for making these reimbursements available, that the costs incurred by the LEA to provide special education are excess costs, beyond the range of normal per pupil expenditures experienced by the LEA. There is no reimbursement for the mainstreamed special child--but there is for the resource room instruction he may receive from, say, an LD teacher, in order to compensate for his handicap. Nor is there reimbursement for any transportaion costs which the LEA would incur anyway; so for example, a Teague child transported to a Teague school housing an EMR program does not entitle the Teague LEA to claim transportation reimbursement, but a Waukula child transported to that same site would result in a reimbursement claim. Second, it should be noted that the state does make allowance for students who may be placed elsewhere on contract; so for example, the transportation of SMH children to the adjacent county is reimbursible, and the LEA may claim a portion of a "program unit" of reimbursement which is calculated by the ratio of the number of contract children served to the average number of children placed in a special education class in that district. So for example, if the average special education class size were 10 children, and 3 children were served by contract in another county, the Cooperative would be reimbursed the three-tenths of a program unit, that is three-tenths of $8,060. Finally, we may note that the Cooperative is charged with all of the paperwork attendant to reimbursement, relieving the local districts of this tedious responsibility.

Of course, state reimbursements alone do not pay the full cost of educating these children, nor should they, since the district should assume responsibility for at least the normal per pupil expenditures. The actual costs incurred by the Cooperative, over and above state reimbursements, are billed back to the member LEAs on an equal-share basis; that is, each of the five members pays one-fifth of this cost regardless of the number of children which it refers for Cooperative services.

This arrangement is rationalized on a number of grounds. First, members were initially anxious to arrange matters in such a way that no damper would be placed on referrals; this equal-share arrangement encourages the LEAs to refer everyone who might possibly profit from special attention. (As a result, a very few feel there is a risk that teachers will abuse the system by referring to the LD program children who are not "true" LDs but simply difficult to teach. There seems to be agreement that the number of such "abusers" would be small, however. Second, the members found it impossible, especially without experience, to determine a fair way to calculate a per-pupil cost. Pupils come and go; different programs cost different amounts; teacher-pupil loads vary randomly; different teachers and different paraprofessionals command different salaries; and so on. Rather than tackle this "algorithmic problem," as one informant put it, the members simply found it easier to agree on equal shares. Third, as we have already suggested, the local culture is to share and share alike on tasks without demanding too accurate an accounting of who "comes out ahead" and "who is losing out." It was apparent that no LEA could respond to the legal mandate on its own, and whatever the size of the contribution it made to the Cooperative, it would amount to less than a solo effort.

The charge-back formula presently being used might be stated as follows:

$$\frac{\text{Total Costs - (State Aid + Project Funds)}}{5} = \text{\$ billed to each LEA.}$$

Table 5

COOPERATIVE BUDGET CATEGORIES AND AMOUNTS PROJECTED FOR 1981-82*

Category	Amount	
	Dollars	Percent
Administration	35,850	7.82
Instruction	296,975	64.81
Transportation	55,800	12.18
Plant Operation	16,500	3.60
Plant Maintenance	3,250	0.71
Fixed Charges	36,850	8.04
Capital Outlay	13,000	2.84
Total	458,225	100.00

*Project budgets not included.

Let us see how this works. Table 5 indicates the major budget categories and amounts projected for 1981-82, exclusive of project costs. During this same period reimbursements could be charged to the state as follows (recall that "program units" include part-time specialists such as physical therapists and pro rata charges for contract services):

16.5 program units (Teachers) @ $8,060	$ 132,990
14.5 half-units (Paraprofessionals) @ $4,030 . .	58,435
Transportation, $55,800 X .8	44,640
Total Reimbursible	$ 236,065

If we subtract this reimbursible total from the full costs (less project costs) of operating the Cooperative, the amount billed back to the LEAs must equal \$458,225 - \$236,065 = \$222,160. Each LEA's share is thus \$222,160/5 = \$44,432. (It should be noted that this is an approximation since the data of Table 5 represent the projected budget.) The total bill-back amount for the 193 students served is \$222,160/193 or \$1,151 (a slight disparity from the \$1,042 figure shown in Table 3 because of variations in base data).

This dispersal is seen as unfair by those districts sending fewer children for service. A "quick and dirty" estimate (made by multiplying \$1,151 by number of students served--see Table 3) suggests that the district sending fewest children may be paying almost \$35,000 more than it should in comparison to the district sending the most children. The Cooperative Director attempted to move to a new formula about a year ago that would have placed the charge-back on a per-pupil basis, but this effort was successfully aborted by the LEA sending the most children since the basic agreement called for a unanimous vote on any proposed changes. There seemed to be little doubt that as the agreement draw to a close at the end of the 1981-82 school year, a new agreement would emerge featuring a new chage-back formula. One formula discussed would divide overhead costs by five, add in a per-pupil charge and a travel charge (travel is also unevenly divided over the LEAs), and subtract the district's contribution of space and facilities. The Director believed that the formula which finally emerged would take account of local wealth, the total student enrollment in the district, the cost per pupil, the percentage of state equalization, and the number of exceptional children served. Many informants felt that the fear that, if costs were divided on a per-pupil basis, LEAs would be reluctant to refer cases, is now unwarranted; parental and advocate group pressure simply makes that option untenable. However, they do feel that there would be one positive referral gain: LEA Boards would see to it that teachers could not refer cases of difficult but not actually handicapped students; close scrutiny would assure that such cases would "stay at home" and be handled by the teacher as part of the normal load.

Scheduling

The Cooperative carries a variety of scheduling responsibilities, including devising an annual school calendar for special education services, scheduling transportation, and dove-tailing the removal of special students from mainstreamed classrooms for service.

The annual calendar is developed by the Director and approved by the Board. For 1981-82, this calendar comprised 181 service days (beginning in mid-August and ending at the end of May) for teachers, including in-service days and parent conference days. Paraprofessionals reported three days later than teachers and were released six days sooner. The development of this calendar poses some problems since the member LEAs do not share either a similar school year or daily time periods. While the local Boards of Education assert that their calendars are set for the convenience of their patrons, and, since their needs differ, so do the calendars, there is some reason to believe that these differences are maintained as an assertion of local autonomy in the face of what are perceived to be externally "laid-on" requirements for cooperation.

The problem of developing an annual calendar is not nearly so much affected by this perception than is the daily schedule, and particularly, the scheduling of transportation. Thus the Director asserts that "variable county schedules are the main problem in scheduling, not the distance traveled." And of course he must consider not only the differences in school days but the fact that local transportation schedules are given first priority by the LEA; only after its "regular" have been transported are busses made available for special students. The special busses thus begin at a considerable disadvantage in getting students to school on time.

For the EMR students, this problem is exacerbated in that they must travel across district boundaries. All EMR students not served within their own LEAs are transported to Teague as a central point; they then transfer to a bus coming from the district in which their program happens to be housed. The total time on the bus may thus exceed by a significant amount the one-hour rule of thumb set by the State Department, and may also result in reduction in instructional time below the state mandated minimum of 6 hours per day. It is for these reasons that the Cooperative has been so interested in finding ways to utilize bus time for instructional purposes via the Drivers for Special Buses Project. At present aides and older students riding buses are utilized on an ad hoc basis for this purpose, but no one claims that these efforts are very effective. Of course, more flexibility and cooperation from the member LEAs in scheduling would improve the situation somewhat.

We have already seen that itinerant teachers, primarily LD and speech/language, who must work one-on-one with students who are mainstreamed, must also adapt their schedules for several reasons. It is important not to remove a student at a time when he or she would miss significant instruction. It is important not to remove a student when to do so would disrupt class activity for the regular students. It is important not to remove a student in ways that emphasize the removal and thereby stigmatize the student. Moreover, the itinerant must apportion time to be able to deal with whatever number of students there may happen to be in a given building. Sometimes this means, for the speech therapist, being able to devote only 20 minutes per client per week--an amount of effort whose efficacy may well be doubted.

Finally, we may note that the Cooperative operates under a "three-fifths" close-down rule. If for any reason, for example, weather, or failure of the heating system, as many as three of the five member LEAs decide to close down for the day, the Cooperative will not conduct special classes or activities. If only two are closed down, the Cooperative does operate, but of course not in the schools in the closed-down district(s). It should be noted that on such days, the Cooperative may claim state reimbursement even for the closed schools.

Scheduling then is a problem, but one for which ground rules appear to be well developed and understood. The most crucial time is at the beginning of the year, according to the Director. The Cooperative staff takes about a half-day to devise a provisional transportation schedule, which is then implemented. "We run it and see who complains. We adjust accordingly." So far, it seems clear, the problems have not been insurmountable.

Relationships of the Cooperative

The essence of any cooperative is cooperation; the degree of effectiveness which an agency like the Cooperative can achieve is acutely dependent on the quality of the relationships which it enjoys with related agencies and reference groups such as parents and teachers. Our intent in this section is to explore the Cooperative's relationships with a number of key others.

Relationships with Member LEAs. It must be recalled, at the outset, that the Cooperative was not an entirely free creation of the member LEAs; while it did have a more or less voluntary precursor, that precursor was devised as the Riverhill districts began to see the handwriting on the wall. In any event, had the precursor not existed, the passage of 94-142 likely would have forced it. The existence of the Cooperative represents an abridgement of local autonomy and a restraint of free choice, in the eyes of some locals. The distinction between "your kids" and "our kids" remains--especially under the present equal-shares arrangement which makes each district responsible for the excesses of the others. *On that basis alone, the prognosis for a successful cooperative venture must have appeared to be low three years ago when the agreement was signed; in retrospect, one must regard the relatively high level of success of the Cooperative as a pleasant surprise*.

The Agreement represents the *formal* conditions of relationship and sets the parameters for the exchange of goods and services. We have already reviewed that document and noted its most important features (see pp. 11 *ff*). But the *informal* relationships are equally weighty, and that they work as well as they do is most often credited to the efforts of the Cooperative Director, whose political know-how in this context is plainly apparent. One would hesitate to call the Cooperative a "good old boy network," for the main characters hardly fit the good old boy stereotype. Yet there does exist a potent informal influence network, as that term is used by sociologists. And the Director is at its hub. He makes virtually all his contacts by telephone or in person; characterizing memos as "cold." He makes an effort to see each principal and superintendent for "coffee and a chat" once a week--although that good intention has often fallen by the wayside since the inception of the bus project, which siphons away half his time. He "coaxes and cajoles" so as not to be excluded from important decisions while at the same time protecting the Cooperative from having undesirable tasks "pushed off onto it." "You gotta be an assistant coach," he says. And we have already noted how he consults with individual superintendents on important issues he intends to present to the Board, to be sure they will support his recommendation.

Despite these efforts by the Director, things do not always go smoothly--problems do arise. Many locals continue to resent the Cooperative, believing that "it gets all the money" (read: it scoops up all the LEAs' flexible funds) but has "an easy way to go--fewer kids, less accountability, and so on." The Director, it is asserted, need not answer to a constituency in the same way as do the superintendents. Further, there is some doubt whether the whole thing is worth doing at all--an attitude especially prevalent in those communities that have some transient population elements. "Why should we pay for a lower class kid who's not even a member of our community?" Further, there are the omnipresent problems of turf. Who's really responsible? Who's really in charge--especially when the Coop teacher comes into my school? Communication suffers too. Comments such as, "We speak a different language"; "You're not in the building when I need to ask a question"; "The Director always seems to be out of town, or doing something on the bus project, and the assistant director is not really in a position to provide us with an authoritative answer"; are sometimes heard.

But despite these difficulties the Cooperative is generally viewed positively. If nothing else, it relieves the LEA administrators of the enormous burden of fulfilling the mandates of P.L. 94-142 and the related state laws and regulations. It takes over most of the paperwork burden, and it takes the heat if findings of non-compliance are made. And it is a source of help. As one informant put it, "They have the expertise, know what to do, and they can point you in the right direction."

In the final analysis, as one might expect in the real world, the degree of cooperation that exists between the Cooperative and the LEAs cannot be easily summed up. "It depends." It depends on the issue at hand. It depends on who is affected most. It depends on the attitudes of the major actors involved. It depends on the political implications. One cannot give a rating of "+7" or "-4" and expect that rating to be predictive in all situations and at all times. Relationships are generally positive, but some are much better than others. It depends.

Relationships Between Special and Regular Teachers. The relationship between regular and special teachers is heavily mediated by the type of special teacher being considered. Those EMR teachers who operate from self-contained classrooms are for all practical purposes part of the regular staff--and they usually share in such duties as lunchroom or recess supervision. The itinerants occupy a very different niche; for them the major problem is to build trust, to overcome the image of the "outsider," to prove that they have "common sense."

Whether itinerant or self-contained, however, special teachers interact with regular teachers in a number of standardized ways. There are formal consultations about particular children, for example, an LD teacher working with a regular teacher so that each might better understand the child, devise some common objectives which both might work toward, or share insights that could be developed only in their own unique contexts. Second, the special teacher may act as a resource for the regular teacher, mentioning teaching strategies, materials, and so on that might be useful. Some regular teachers report that such information is highly useful in helping them with their regular teaching responsibilities as well. Third, there are the interactions that occur as part of prestaffing or IEP staffing sessions, although, as we have noted, the image of competence projected in such sessions on either side has been less than satisfactory. Finally, there are informal interactions in the teachers' lounge, the lunch room, the restroom, that are also influential in shaping mutual perceptions.

At the same time, there are several standard problems that emerge between regular and special teachers. How are they to share the responsibility for a child? One regular teacher suggested that the special teacher should test, evaluate, and prescribe, while the regular teacher should carry out the prescription. Would that approach satisfy everyone? How are they to share the teaching? Who determines what to teach and how to teach it? Is the former the task of the regular teacher and the latter that of the special teacher? Who determines the child's grade? It is appropriate to make "deals" that prevent the special child from getting more than a certain grade, say "C," simply because he or she receives help from a special teacher? How can they decide on the schedule--to take children out of the class for help, to meet together for consultation, to staff?

The special teachers appreciate that they have a problem and they work consciously at dealing with it. "It's hard," one observed, "for regular class teachers to understand what a teacher without a classroom does with his or her time." A feeling of resentment is built up, it is asserted, by the regular teachers who believe that the special teacher controls his or her own time, works fewer hours, escapes onerous duties such as lunchroom supervision, and the like. To compensate, special teachers try very hard to be helpful, to relieve the regular teachers of paperwork burdens, to assist with problems even though they may actually lie outside the purview of special education, to develop alternative methods and strategies, to adapt materials. One special teacher has gone to the trouble of developing an orientation leaflet about LD for the teachers in her school. All of this help is given in unobtrusive ways to avoid antagonizing the regular teachers. And it seems to be working; many itinerant teachers report that the regular teachers are turning to them more often, and with greater confidence, while many regular teachers report that they are much more comfortable with the special teachers than even a year ago. (No doubt the experience of both regular and special teachers as members of Professional Planning Teams also contributes to this greater rapport.) But of course the need to make this public relations effort siphons off time and energy which the special teacher feels ought to be devoted to serving handicapped children. Clearly, however, the effort is not wasted, for without it, it is unlikely that the special teachers would be doing any teaching at all. An unfortunate matter? One that would exist only in a benighted rural area like Riverhill? Hardly; Riverhill is not benighted in any event, and the new kid on the block must always prove himself to be accepted.

Relationships Between Special Teachers and Administrators. Regardless of whether one considers the self-contained or the itinerant special teachers, it is clear that they serve two masters: the Cooperative Director, and the principal (ultimately the superintendent) of the building(s) in which they serve. Recognizing the possibility of a conflict of interest, the Cooperative Board early-on adopted the policy that special teachers would follow LEA rules when on LEA turf. The special teacher is to provide "extra hands and extra eyes" to complement the intents of the LEA.

In practice, as one might expect, the degree of interaction between a special teacher and a building principal is highly variable. Some principals seem neither to know nor to care what the special teacher is doing, expressing only relief that someone is there to accept the burden of the handicapped children. Others are intensely involved with the special teachers, treat them as a member of the school's "family," and support them in every conceivable way. In a few cases building principals appear to be unconvinced of the utility of having special teachers at all; one informant characterized these principals as suffering from "SPEDophobia" (fear of special education). Worse, these principals can "contaminate" their buildings and even the entire LEA by their overt expressions of this attitude.

As a result, the special teachers have learned to "play" the LEA, adopting different collaborative strategies depending on their "reading" of the situation in the building(s) they serve. The same LD teacher, for example, may appear to be a very different person in the two buildings she serves--diffident and "by the book" in one building and assertive and experimental in another. Indeed, the itinerants share information about the several LEAs to help one another "play the game" productively.

Relationships with the State Department of Education. Formally, the State Department of Education has two functions: to monitor for compliance with state and Federal guidelines, and to approve (and by that action, to fund) program applications and applications for reimbursement.

While P.L. 94-142 is implemented via guidelines issued by the U.S. Department of Education, compliance of the Riverhill Cooperative--or any other LEA or cooperative--is monitored not directly with those guidelines but rather with their counterparts as outlined in the state plan. That plan sets out the items to be covered by the local comprehensive plan, which is the primary basis for program approval. The state plan also outlines the forms that must be filed with the state. Finally, a State Department appointed site visit team visits the site to validate the written reports and to observe program operation at first hand. What is important to note about these arrangements is that, from the local point of view, what is crucial is not the P.L. 94-142 statutes and regulations but those emanating from the state capitol. Most locals have hardly any comprehension of the Washington political scene, but are acutely sensitized to the state-level political scene.

In order to stay connected with the state political scene, the Cooperative Director, as we have already noted, invests considerable time and energy in walking the halls of the State Department, stopping not only in special education section offices but in those of other important units as well. He comes to know, for example, which regulations are likely to be enforced and which slighted. He senses where this year's compliance emphases will be placed. And he develops insight into what kinds of entrepreneurial activities will have payoffs in terms of Title IV-C and other grants. It should also be noted that as a result of his presence, the State Department personnel become well acquainted with him and with the Cooperative's operation, a useful concomitant to the informal network.

A final point may be made with respect to another part of the state government which may well impinge on the Cooperative operation. In this state the legislature maintains a "Legislative Post-Audit Committee" which carries out *ex post facto* evaluations on various funded programs.

In 1982 the Committee elected to audit the Riverhill County Cooperative, receiving a "Performance Audit Report" from its staff and presenting it to the Legislature. The content of this report has not yet been made public, nor has there been any indication of legislative reaction. It will be of interest to contrast their findings, whatever they may be, with the results of this case study.

Relationships with Parents and the Community. So far as the Cooperative is concerned, the community is virtually equivalent to the parent group, since it is only the parents with whom Cooperative personnel come in contact. It seems to be the case that the communities have provided adequate support to the member LEAs over the years--although, as one informant pointed out, that is a difficult judgment to make since there have been no recent efforts to seek a levy increase at the polls. The community seems to be aware of special education programs, if not of the legal entity known as the Riverhill County Educational Cooperative; understands that such programs "cost a lot," and wonders if it is "getting it's money's worth." Beyond that, the general public seems to know or care little about the Cooperative or its programs.

There are of course efforts made by the Cooperative to reach the general public and to increase its level of awareness. Newspaper stories appear from time to time; radio stations are willing to make routine announcements such as those relating to screening programs. The Cooperative also utilizes materials available from the National School Public Relations Association, as for example, the booklet entitled "Public Education for the Handicapped," which provides an overview of the provisions of P.L. 94-142. A packet, "Parents Are Very Important People," has been developed for parents of referred youngsters. Despite these efforts, most staff characterize the general level of public information as low.

Formal efforts to establish relationships with parents and to solicit their inputs is limited almost exclusively to the Parent Advisory Council, a group of 10 parents appointed by the LEA Boards of Education, two per member LEA. This Council meets three or four times a year at the call of the Director. The group is not organized to take the initiative in providing input, however; it is described by informants as a sounding board for ideas which the Director has determined to put before them. They are a reactive, not a proactive, Council.

The relative inactivity of this group suggests that parents do not have particular problems or concerns to put before the Cooperative, but, if informants can be believed, this is not the case. They have, in fact, a variety of quite serious concerns:

- That pupils who could profit from Cooperative services are diagnosed later in life than is necessary, and that the diagnoses, when made, are inadequate.
- That the programs that are offered are poor, allowing the children to "grow up dumb and dull."

- That children are transported over longer distances and with greater time losses than is desirable.
- That children assigned to Cooperative programs are stigmatized by teachers and peers; astonishingly, such stigma is feared even by some of the parents of children assigned to gifted programs.
- That students withdrawn from mainstream classes for special help miss too much of the regular instruction.
- That the mixture of regular and special education students in the same building may lead to a collapse of discipline and a reduction in safety.
- That there is no advocacy group or support system for the parents of served children.
- That "more service is needed."

There is nothing surprising about this list. It seems clear that some of these concerns could be counteracted by an appropriate program of information and public relations. Now that the Cooperative is about to move into its second Agreement, and its programs seem to be reasonably well established, it may be the case that the staff will be able to devote more attention to this matter.

Of course if parents have concerns about the Cooperative, the Cooperative staff also has concerns about parents. Clearly the most difficult problem they face is to raise the level of awareness, of the community as a whole but particularly of the parents. Their lack of knowledge of their rights, of the nature of handicapping conditions, and of ways in which they can help their own children, is profound. Most parents enter into the staffing process characterized by passivity. Some of them seem unable to cope with the fact that they have a handicapped child; many of them seem content to allow the Cooperative to accept full responsibility for the child's diagnosis, program, and treatment. Often they equate handicap only with retardation or wheelchair confinement; they seem to be unaware of the fact that these children can be helped to a fuller life. They feel guilt and frustration, and are delighted to have an agency that, ostensibly, takes this great burden from their backs. Of course not all parents fit this caricature; some are very militant indeed. But the majority know little and some seem not to want to learn more. Or so it appears to the Cooperative staff.

Despite this construction of parents, however, it is the case that they are generally supportive. Most seem satisfied with the quality of services received; one parent suggested that "even though we're rural we get an urban level of service." Most say they are "glad to help all we can," even though they may add, "But we don't know enough to know if the service is any good." The final test, as one informant suggested, is that no parent has thus far been sufficiently displeased to file a court case; on the other hand, the Cooperative has not seen fit to initiate due process hearings even when parents have refused service.

Relationships with Other Service Agencies and Cooperatives. Such relationships fall into four classes: child locater, referral and evaluation, service programs, and ad hoc projects.

With respect to child identification, we have already noted that the Cooperative participates in the statewide program, and, in addition, maintains relationships with a number of educational, health, and welfare agencies (for example, Head Start, local physicians, and the county welfare board) to receive referrals. For those children that cannot be adequately evaluated by Cooperative personnel themselves, referrals are made to diagnostic services both in and out of the state.

Relationships are maintained with two other agencies for services to children for whom adequate facilities do not exist in Riverhill County. These include programs for TMR students who are bussed daily to an immediately adjacent county to the east and secondary EMR students involved in the vocational education program who are bussed to the immediately adjacent county to the north. The Cooperative is reimbursed for these programs by the state education agency as described in the section on funding.

The most interesting relationships are of course those that are ad hoc--those that evolve in response to some opportunity or need sensed by the staff that cannot be handled by routine contracts. Two such arrangements have been described, the bus project and the sheltered workshop. The former arrangement emerged as a result of a casual conversation between the Cooperative Director and the director of another cooperative in a very different part of the state. As a result, the two Cooperatives, with the agreement of three others willing to serve as study sites, jointly wrote a proposal for a Title IV-C grant that has produced results not only for the original problem--training bus drivers how to deal with handicapped children--but has also led to an even more interesting project concerned with providing useful instructional experiences for children while on the bus. The second arrangement, the sheltered workshop, is illustrative of the the snowball effect that sometimes occurs when one success--attracting CETA support--leads to other successes--assistance and even a tax levy from the County Board of Commissioners.

It is probably the case that relationships of both the formal (exemplified in child locater activities or program provision) and of the less formal (ad hoc arrangements of the bus project and the sheltered workshop) types will continue and enlarge. Both kinds of relationships have been fruitful and have taught lessons about how to capitalize on opportunities that have not been lost on the Cooperative staff. And no doubt such efforts should be encouraged by the Cooperative Board; in the long run they can only mean better service for the County's exceptional children.

Some Problems of Particular Concern to the Cooperative

As the reader will have surmised from the preceding pages, the Cooperative is not devoid of problems. No doubt the major dimensions of these difficulties are already apparent. Nevertheless, for ease of reference and for the sake of clarity, they will be briefly described again in this section. The order in which they appear is not necessarily reflective of their importance or priority to the people of Riverhill County (indeed, it is doubtful if a single priority listing could be found on which even a majority of stakeholders would agree). They have been arranged in terms of the project staff's subjective judgment about the extent to which the problems are exacerbated by the fact that Riverhill County is a *rural* setting. Thus the first problems are likely to be found anywhere in substantially the same form as in Riverhill County, but as we move down the list, the influence of Riverhill's rural status is likely to become more and more telling.

1. *Interpretation of and compliance with P.L. 94-142*. In many ways, the teachers and administrators involved with special education in Riverhill County--whether Cooperative staff or employees of themember LEAs, must feel that trying to understand and implement P.L. 94-142 is like kicking a 40-foot sponge. The whole is so massive and intractable, that while it yields easily to the force of the foot, it springs back to its former condition just as soon as the force is removed.

First of all, it is virtually impossible to understand P.L. 94-142, a problem by no means confined to the good folk of Riverhill. The law itself is a terribly complex document which challenges the best legal minds. Books (which are often at variance) have been written about its intent and its specific meaning. Indeed, some of the most common jargon used in describing the law, terms like "child find" and "mainstreaming," are not found in the law at all, but stem from other (apparently influential) efforts to interpret it. New Federal regulations were expected to be handed down in the Fall of 1982, but the trial version of these regulations was withdrawn when several members of Congress attacked it vociferously in hearings. Apparently they felt that the proposed regulations were inconsistent with their intent. Further, the recent Supreme Court decision on Rowley (the case of the deaf girl whose parents wanted her school to provide a signing interpreter in class) illustrates the fact that the court makes some constructions of the law that others had not contemplated; constructions supported by a majority of the court but with vigorous dissents from several members appended. Can it come as a surprise then to discover that the teachers and administrators of Riverhill County are a bit confused by it all?

To make matters worse, the interpretation of the law comes to Riverhill not directly from Washington but through a filter in the State Department of Education. We have already noted the tendency of most Riverhill staff to attend *primarily* to State Department edicts; for them, state level officers represent "the law." But, argue the majority of locals, the State Department makes these interpretations out of context to what is going on at the local level, sometimes making things go from bad to worse because of less-than-apt phrasing. One informant suggested that the State Department kept changing its posture depending on how the winds blew. So for example, when the idea of pre-staffing was being considered, the State Department, upon being asked, declared that procedure to be illegal. But shortly, after a group of out-of-state consultants that had come in to do some in-service training on IEPs tacitly approved the pre-staffing procedure, the State Department abruptly reversed itself.

Nor is the State Department the only unstable element in the picture, most locals suggest. They note they are confused by the fact that definitions of handicapping categories vary appreciably across states. So do teacher certification laws--so that a teacher who can handle special classes in the city across the river cannot teach in Riverhill County because in this state the certification laws are different. Even within the Cooperative, things keep changing, for example, the IEP form. It would be nice to have a form we could all live with for a while, an informant suggested, particularly if that form were one promulgated by the State Department, so we could know it was "official."

This interest in "official" forms has another side. The majority of the Cooperative staff and of the regular teachers and administrators of Riverhill County who work with handicapped children feel terribly vulnerable; in some ways, their greatest fear is that they will be found to be "out of compliance." Is what they define to be a least restrictive environment one that would be concurred in by a State Department monitoring team? When evaluations are made, diagnoses reached, and prescriptions tendered, would they be found "correct" should a parent challenge in a court of law? A majority of the Cooperative staff that served as informants for this study indicated that much of the "extra" paperwork they did (and the regular paperwork is bad enough; see below) was intended to provide a trail of documentation that they could present if challenged. A major concern of the Cooperative staff is that not knowing exactly what the law is about, they may be found to be in violation of it out of ignorance. So when one does something, the thing to do is to make a record of it and give the reasons why; perhaps, if the action is found illegal, it may at least be found to be extenuatingly rational!

Finally, a majority of locals say, the whole process required is too complex to be understandable anyway. Referrals come to us in garbled form and we don't have time to sort it all out. We can't count on complete and accurate diagnoses. We can't count on IEPs that will do much good. Even if we could, the teachers and administrators responsible for carrying out their provisions don't know enough to do them well, particularly if they are things a regular teacher must do with mainstreamed youngsters. These teachers were hardly prepared to do regular teaching, let alone knowing how to deal with exceptional youngsters. And there really is no efficient way for them to acquire the skills they need to cope satisfactorily. And even if they knew enough, the rules are too inflexible to permit the making of sound professional judgments. Too many cases are borderline but decisions about them have to be made on arbitrary rules, like a rigid IQ level to decide who might and might not profit from being in an EMR class. Decisions about whether emphases ought to be placed at the elementary or secondary level are also closed off. And so on. Given all that, they seem to be saying, is it any wonder that we find the system unworkable?

There is little doubt that the inability of the teachers and administrators of the Cooperative and the other Riverhill education units to understand P.L. 94-142 and to determine in some non-arbitrary way whether they are in compliance with it is a matter of the utmost seriousness. Nor is this problem one for which they can devise an adequate coping strategy. One cannot be surprised, therefore, to discover that they are not coping with it very well. Yet they are doing about all that they can. Their integrity and commitment should not be doubted; the difficulty is real. Only changes in policy can be expected to help.

2. Paperwork. If the paperwork overload is not the most serious problem facing the Cooperative, it is certainly the most frequently mentioned. It is a complaint as often encountered as the common cold in January. And there can be no doubt of its validity. Paperwork demands come in many different guises.

Most commonly condemned are the many forms, memos, letters, minutes, and the like, associated with the development of the IEP. The process by which children are referred, evaluated, and staffed has already been described; virtually every step of the flowchart displayed in Figure 2 involves some kind of paper entry. Should a due process hearing be invoked as a result, there is more paperwork associated with the steps shown in Figure 3. One informant asserted, and one might guess not too facetiously, that only 25 percent of the effort of developing an IEP went into thinking through instructional objectives and strategies; the remaining 75 percent goes into paperwork the "boiler plate" of the IEP. Moreover, because of their special expertise, and because it is politic for them to acquiesce, Cooperative staff, including especially itinerant teachers, are asked to do much of the paperwork that might properly belong elsewhere. Of course, the importance of the paperwork connected with the IEP should not be underestimated; it not only complies with the law but is the basis for all child services thereafter. While undoubtedly onerous this paperwork could not be eliminated even significantly reduced.

Once a child is in the system, a trail of paperwork accompanies his or her progress through it. IEPs must be consulted every day and entries made. Systematic evaluations must be entered on the appropriate form every nine weeks, and those evaluations, and many other paper examples of the child's progress, are to be discussed with the parents at those intervals also. The file on an individual child can rapidly become an inch or more thick--every item in it representing elaborate paperwork on someone's part.

Third, all special teachers are inundated with paperwork needed to coordinate the roles and responsibilities of the several actors in the drama. Teachers need to know on what schedule an itinerant, say, will be in the building, whom he or she will want to see, and when. The itinerant in turn needs to schedule appointments to discuss the children's work, map out joint strategies, or simply serve as a resource. He or she will need to post schedules in every school she services, as well as at the Cooperative itself, so that anyone who needs to reach him or her can do so. That means a location and telephone must be listed for every hour (more likely, every half-hour) of the day--a week in advance. Moreover, he or she must file an actual schedule afterward; plans do change, and an accurate record of contacts is required. He or she must apprise the building principal of his or her schedule to preserve protocol. He or she must develop and file lesson plans. Now of course all of this scheduling activity helps the Cooperative staff get the work organized, but there is probably more organization here than most reasonable people would need, certainly more than they would voluntarily impose upon themselves.

Finally, the teacher must leave an audit trail--detailed documentation of all activities. One informant indicated that she felt compelled to "account for my time minute by minute." That means logging all contact time--who was seen, when and for how long, for what purpose. Mileage consonant with the consultation must be logged. And all keep a personal diary for protection, as suggested in the preceding section.

How long does all this paperwork take? Some informants suggest that at a minimum, one full day per week must be invested in "compliance paperwork." In some cases it may run 50 percent or more, as for example, at a time when many IEP staffings are being held. The Director, and others who echo him on this point, indicate that successful operation of an agency like the Cooperative requires "people people, not paper people," a fact which at once accounts for the distaste that most Cooperative staff exhibit toward paper work (they are by disposition people people) and for the extent to which the paperwork is in disarray. That, and the fact that there just isn't enough time for the most compulsive person to get it all done.

What is the Cooperative doing about *this* problem? Not much is possible; the paperwork requirements are mainly imposed, beyond the control of the locals to do anything about them. The adoption of the pre-staffing was intended, among other things, to cut down somewhat on the paper work; in that it has succeeded, but the volume of paperwork is still monumental. There is talk at the Cooperative about developing a computerized IEP form; armed with "boilerplate" software and access to student records, the computer could with minimal input (e.g., the actual statement of objectives) "crank out" the IEP with considerably less investment of time than is currently the case--even though a minor loss of individualization might result.

But again, the change most likely to help can come only at the policy level. Much of the current paperwork is compelled by a compliance posture, born out of Federal distrust of locals who are (it is apparently believed) quite willing to turn their backs on their handicapped children unless compelled to take a more responsive posture by outsiders. This assumption is on its face absurd, especially in a rural setting with a strong tradition of "taking care of one's own." But that's a problem in its own right, as we shall see.

3. *Bifurcation of Control and Responsibility*. Even a casual observer of the Cooperative soon recognizes the bifurcated nature of authority/responsibility channels in the situation. The question, "Who's in charge here?" or, "Who's to blame (or praise)?" is likely to bring two or more answers.

The ambivalence begins at the very top. The Cooperative has its own Board empowered to set policy, make fiscal determinations, and approve programs. Those decisions impinge upon the everyday operations of the five member districts. But such matters happen, legally, also to be in the purview of the LEA boards. It takes but one example such as the LEA boards' electing to operate schedules independently, to the detriment of the Cooperative's scheduling, to realize the power of the local board to counteract or reinforce Cooperative Board decisions, as they may choose. Of course the Cooperative Board is appointed by the local boards, in part to insure that the Cooperative will not make decisions that do not take account of local interests. Nevertheless, once constituted, this governance system has the potential for conflict. And if the local boards do not happen to agree with, say, a policy decision of the Cooperative board, can they be held accountable for carrying it out?

The difficulties spawned between boards are reflected in the agents who are the official implementers of board policies--the Cooperative Director, on the one hand, and the LEA superintendents, on the other. It is no accident that the Director finds it politically useful to make a weekly round of superintendents' offices for "coffee and chat." It is imperative that possible areas of conflict be identified and worked out, informally if possible, so that the difficulty is not reflected up to the Board level where a public decision will need to be made. Such informal negotiation is simply prudent; superintendents are not villains merely granting them that but professionals who must assess the impact of proposed cooperative actions and make whatever response seems best in terms of local interests.

At yet another level, there is a clear bifurcation in authority between Director and building principals. Principals are traditionally responsible for everything that goes on in their buildings. That injunction certainly also covers special education, even if provided by Cooperative teachers. Who decides if the principal asks things of the Cooperative teachers that are inconsistent with Cooperative directives? We have already seen that it is Cooperative policy, probably in anticipation of this possibility, that the special teacher shall at all times conform to the principal's wishes. Can the Cooperative teacher always follow this injunction? Will he or she not experience the biblical "two masters" problem? When the chips are down, to whom does the special education teacher owe loyalty--principal or Director? More importantly, will he or she be able to tell in some particular set of circumstances?

And what of the interaction between regular and special teacher? We have also seen that there are many potential areas of conflict between these two roles: over scheduling, programming, grading. And often the some regular teachers feel at a distinct disadvantage, especially if they must accept the advice of the special teacher about some problem that was not handleable.

Parents provide another focus for conflict. Some parents feel disconnected from their child's teacher when that teacher operates in a building many miles away, or comes in once a week to work with the child. The majority of special teachers feel frustrated over requirements that they must report to parents at nine-week intervals, an arrangement which seems to give the parents some special regulatory authority. Most of all, many parents have trouble with the whole IEP process, feeling, on the one hand, that the school with its special facilities and expertise, knows best, but retaining the right to be critical if things go wrong.

The situation we see here is another one of the "contextual" factors producing difficulties largely beyond the control of locals. There is nothing about Riverhill in particular that produced this problem; it exists anywhere and anytime that several agencies agree to cooperate to solve some common problem. Some elements of the problem, for example, the parental aspect, would exist even if each of these five LEAs were operating its own special education program. But it is a debilitating problem. Hardly anyone feels confident about his or her ability to initiate a positive action; everyone seems to have a veto. Many feel powerless. Many also feel vulnerable; in this ambiguous situation, who is to say where the axe of accountability may fall? Of course this very ambiguity also gives everyone an "out"; there is always someone else who shares the responsibility to whom the blame can be shifted. If one is looking for an organizational pattern in which authority and responsibility are clearly delineated, the cooperative is not the answer. But this ambiguity is one of the trade-offs that must be tolerated for the sake of cooperative resolution of a problem that no one of the member agencies could resolve alone.

4. Stigma. "Special" people are different, whether they are "jet setters," athletes, immigrants, or simply youngsters assigned to special classes or labeled in special ways. Sometimes the particular quality of "specialness" is something that people envy; at other times it becomes pejorative. Unfortunately, being labeled "EMR," "LD," or even just "mainstreamed" belongs in the latter category.

The degree and kind of stigma which is attached to a child depends in part on the nature of his or her label. In Riverhill County, there seem to be three levels. The first occurs when one is labeled "gifted." Curiously, one might expect this label to be desired and admired, but in fact it is not. Like all labels this one separates the gifted child from his peer group. To be labeled "gifted" is to be set above one's peers, a distinction very likely to earn one the hostility of one's age/grade mates. For the child the label bears another problem: it means that he or she is expected to do more than the others. Some children can accept that charge with grace and motivation; others resent it. Finally, and perhaps most astonishingly, even some parents seem to resent the label for their children, perhaps because they share their child's feelings about it, and perhaps because they fear that in the long run, the label will harm the child more than it will help.

The second kind of stigma is that attached to children who are being mainstreamed; in the Cooperative that means primarily LD children, but also includes those seen by the speech therapist and a few borderline EMR pupils who were believed to be able to profit more from regular classroom instruction than from special class placement--in the spirit of "least restricted environment." These children are identifiable as "different" because they leave the regular classroom from time to time to work with an itinerant teacher or participate in some therapeutic program. Some "regular" children, perhaps out of mere curiosity, continually question these special children about what they do outside the room; they, being naturally reluctant to admit a deficiency, are likely to be secretive and so exacerbate the situation even more. Moreover, the teachers abet their secrecy by arranging teaching sessions on the least obtrusive schedule they can manage. But of course the regular children are not fooled. The special children become targets for innocent but telling jokes. The regulars tend not to socialize with them very much. And finally, if their presence in the classroom seems to be the cause of "slowdown" in the teacher's normal schedule, so as to accommodate the handicapped, the regulars may react with "resentment and disgust."

But the chief victims of stigmatization are the EMR youngsters who are taught in self-contained classrooms. Most are bussed in from other districts and so are recognizeable in the school as "not one of us;" even the teachers are likely to refer to them, although without rancor, as "transports." While many of the children in the school make an effort to be friendly and helpful, others make them the butt of callous jokes. The EMR children seem to understand that some of this joking is inevitable, but when the non-handicapped students do not sense that they have overstepped their bounds, the special children are likely to react with anger, shouting back and engaging in other hostile behavior. No doubt they thereby affirm in the minds of the other children their "dangerous" character. And thus are stereotypes reinforced.

Nor is the stereotyping of EMR children limited to occasional hallway or playground incidents. It will be recalled that the Cooperative's initial effort to provide programming called for the establishment of "Interrelated Learning Centers" in which *both* LD and EMR children would be serviced together. That plan was soon abandoned, ostensibly because of "population shifts" in the county, but actually, some informants insist, because some parents of LD children refused to have them taught alongside children whom they, and apparently the community in general, considered "stupid."

The stigma of special education is not dissimilar to the prejudices which one may see acted out in virtually every other area of life as well. In other areas, some reasonably effective techniques have been developed for dealing with it, but neither the educational community at large nor the Cooperative has managed to devise adequate coping mechanisms for special populations. The efforts of the schools, such as mingling EMR children with their age/grade mates over lunch or recess, seem puny in relation to the magnitude of the problem. Major educational efforts seem to be called for. Several informants noted that stigma is a more serious problem at the secondary than at the elementary level. But of course secondary youngsters should also be more easily teachable about the problem, and have a wider range of experience for understanding it.

Stigma is a major national problem associated with special education, perhaps even having its roots in widespread earlier beliefs that handicaps were visitations from God in response to special sins. But in this day and age, its occurrence takes one by surprise and leaves one chagrined. It is one of those unpleasant and unanticipated side effects. Moreover, despite the general recognition of stigma as a problem, no one seems to have an effective way of dealing with it. So again, one cannot be surprised by the fact that the Cooperative has been unable to cope with it either. Here is a real challenge for the Cooperative--if a national, adoptable solution does not exist, perhaps the Cooperative can, by creative leadership, invent one.

5. *Community Ignorance and Parental Apathy*. It is safe to say that the level of community awareness about special education in general and about the Cooperative in particular is very low. As one respondent put it, the community stereotype of special education is to equate it with "retards and wheelchairs." There is some feeling that the Cooperative is an agency forced on the community despite the fact that the several LEAs were doing very well, thank you, for their handicapped youngsters on their own. The community seems to be aware of the fact that the Cooperative represents a substantial fiscal investment, although that awareness is likely to be expressed in the phrase, "It costs too much!" The community does not bestir itself very much to provide employment opportunities, using safety as the reason for not hiring handicapped in industry and nonsuitability for farm pursuits for not hiring them in agriculture.

Parents, as a subgroup of the community, might be expected to be somewhat more attuned to the needs of the handicapped but they are not. There is little contact with parents except during the IEP process, and here most parents tend to be passive, accepting the school's decision as law. They tend not to know their rights, or if they do, not to be militant about them. There have been no due process hearings nor court cases in the history of the Cooperative.

From the point of view of a bureaucracy, keeping a low profile, having the community generally ignorant of what the agency is for, and maintaining an aura of special professional comptenece that overwhelms the client may be useful for survival. But on the other hand, such a posture cannot be justified from either a legal or moral point of view. No one in the Cooperative, in any LEA, or indeed, anywhere in Riverhill County, is counseling such a strategy. But for all practical purposes things are working out that way. The community remains ignorant; the parents remain apathetic.

The Cooperative staff is of course aware of this problem, and is making some effort to deal with it. An information packet is currently under development to be sent to parents. The Cooperative does have a public information program, utilizing newspapers, radios, and booklets. Both the Board and the Parents Advisory Council are utilized as informal but powerful community links. However, no one claims that this program is pursued as assiduously as it might be. And surprisingly, there has been no effort to develop a support group which numbers of parents feel would be very helpful. *In contrast to the problems discussed earlier, the problem of community ignorance and parent apathy is one that the Cooperative can work on and expect to do something about*.

6. *Low Level of Resources*. It is a truism that "more funds" will always appear near the top of any agency's "wish list." The question, however, must always be whether the agency *can* operate at an *acceptable* level of performance (in relation to its legal mandate) with the resources it has. In the case of the Cooperative, and perhaps of most other agencies providing services to the handicapped, the answer to that question is probably "No."

P.L. 94-142 has as one of its four major purposes "to assist states and localities to provide for the education of all handicapped children." In the case of the Cooperative, we have seen that the state's reimbursement formula provides about $1,363 per child served, leaving about $1,151 per child to be billed back to the member LEAs. The total of these two figures, that is, $2,374, is almost exactly the regular per pupil cost in Teague and Waukula (about $2,300 and $2,350 respectively) and below the per pupil expenditures in the other three districts (about $2,700 in Media, $2,750 in Hillcrest, and $3,100 in Rivertown). Of course, the conclusion should not be drawn that the districts are using Federal funds to supplant rather than supplement local funds; to these amounts must be added the (unknown) costs for facilities, regular teachers, overhead costs, and the like. These vary from a great deal extra for that child who may be seeing an itinerant for only one period a week to very little extra for the EMR child taught in a self-contained classroom by a Cooperative teacher. Nevertheless, one must be struck by the fact that amounts spent are not very much greater than for "normal students." The moneys coming from the state do not provide that much extra assistance. If the intent of P.L. 94-142 is to make an exceptional range of added services available, the funding pattern is off the mark. It can probably be argued that it is only prudential administration in the Cooperative that makes it possible to provide these extra services somewhere near the normal range of cost.

The poor level of funding seems to have two immediate consequences: limiting the program and keeping it at a mediocre level. With respect to the first, referrals to a program are likely to be limited by the available capacity for responding to them. The member LEAs exhibited some concern, on entering into the cooperative agreement, that referrals would be heavily mediated by charge-backs from the Cooperative; wisely, therefore, the agreement provided for equal-shares reimbursement (among other reasons for this decision). And capacity is clearly a function of resources. It seems reasonable to suppose that more children would be referred if there were facilities to receive them and programs to help them.

With respect to the level of mediocrity, it seems plain that the Cooperative is getting by only through great personal effort in the face of inadequate support. Space is poor; the Cooperative gets what the members can set aside after their own needs are taken care of. The Cooperative's resource rooms are overcrowded and must often be used by multiple occupants at once. Materials are inadequate; the resource rooms are minimally supplied; the Media Center is stocked on a hit and miss basis; itinerants can carry the materials they have with them in a car. Staff are not exceptionally well paid. More paraprofessionals could be effectively utilized to carry out prescriptions made by the special teachers. And so on.

The resource picture thus leaves a great deal to be desired. In the Cooperative's case--and perhaps in the cases of most agencies providing services for handicapped children--the lack of resources is a major problem. And this problem is not one about which much can be done at the local level. Action must begin at the level of Congress, which needs to ask itself whether its third purpose--assisting states and localities--is being met, and whether its other purposes--including more particularly a free, appropriate public education--can be met without some fiscal adjustment.

7. Pupil Staffing Difficulties. The process whereby children are diagnosed and assigned to a treatment program has been and continues to be a major source of difficulty. We have seen that the process produced so many problems, for example, being cumbersome, time-consuming, embarrassing to members of the Program Planning Team (PPT), and overwhelming to parents, that the device of pre-staffing was introduced (see Step 7, Figure 2). The utilization of pre-staffing has apparently ameliorated some of these difficulties and most teachers and parents seem to prefer it to the original process.

But other problems continue to plague Cooperative and LEA personnel. Not all referral judgments are based on sound evidence. Once it has been determined to make an evaluation, considerable time may elapse--although the turn-around time has been considerably reduced since the advent of a new school psychologist a year ago. The validity and quality of the evaluations, whether done in-house or elsewhere, is also questioned by some. Perhaps the greatest difficulty confronting the Professional Planning Teams is how to distinguish between LD and EMR cases, a determination fraught with multiple dangers.

Persons involved in the staffing, whether members of the PPT or others, have not always done their homework, failing to acquaint themselves thorougly with the facts of each case. As a result, there may be considerable confusion and several false starts. Parent inputs are less than desirable, with a majority of parents being perfectly willing to let the professional staff make all the decisions.

PPT members are also caught up in another bind. On the one hand, most everyone seems to feel that the earlier a diagnosis is made and treatment is begun, the better for the child. On the other hand, there is no early childhood money, so very early identification is not practical. Further, both LD and ED children are more easily diagnosed at a later age, when the nature of their difficulties becomes more apparent. These two conflicting influences, one demanding early intervention and the other forestalling it, must be played off against one another by the PPT in reaching a decision.

Finally, as we saw in the immediately preceding section, funding levels are ultimately determinative of the services that can be offered. As PPTs make their decisions, they must be mindful of the number of still available "slots" for the children they are placing. Even though they may be advised not to take resources into account in making their judgments, it is of course difficult for them not to do so.

The problems associated with the smooth flow of the staffing process are thus a mixed bag. There seem to be no immediate solutions to the problems of time and energy and conflicting forces that dog the professional staff engaged in carrying out the staffing. No doubt the process will become more streamlined and efficient as experience is gained and other shortcuts like the pre-staffing occur to people. But there probably is no systematic way to attack these problems, nor is it clear whose responsibility it might be to mount an effort to overcome them. One can predict, therefore, that this particular problem will be around for some time.

8. Transportation. Transportation is one of those niggling little "practical" problems that seems trivial until one tries to deal with it, whereupon it may suddenly loom very large indeed. Of course, Riverhill County is not a remote area; it consists, after all, of but 388 square miles, intersected by tolerably good roadways, not as rugged as the name "Riverhill" might suggest. But it would be a mistake to underestimate its transportation problems.

Most of the students serviced by the Cooperative are mainstreamed students; they are transported every day to the normal attendance building in their home LEA. Whatever transportation problems they face are identical to those faced by all their fellow students. But other students are not so fortunate. Thirty-seven EMR students (with few exceptions) are transported either to one of the three self-contained classrooms or to the area vocational school under the VATSS program; their transportation is managed by having busses from their own LEA transport them to Teague, a central transfer point, and hence to whichever building they attend. For some this commuting may require more than an hour each way. The seven students who are transported by the Cooperative bus to the adjacent county--and recall that these are the more severely handicapped--are not so fortunate. In the mornings they are driven to Waukula by "home" busses, and are then transported to the special facility. In the evenings, they are picked up at the facility by the Cooperative bus but are driven directly to their homes. The total time on the bus for these students may total to over three hours daily! The Cooperative hopes to solve some of these problems through the bus project.

A very different kind of transportation problem confronts the itinerants--LD teachers, school psychologist, and speech therapist, who commute to and between the schools that they service. Each drives his or her own car, with mileage being reimbursed by the Cooperative (which recovers 80 percent by state reimbursement). Ten percent of the school day may be used for travel by even those teachers who divide their time between but two schools (e.g., the LD teachers), and more by those who must make multiple stops. The schedule is sufficiently pressing that the speech therapist, for example, is able to devote only 20 minutes once or twice a week to his clients.

The whole is exacerbated by the weather. Riverhill is part of a state known for its rigorous winters. When snow falls it may be severe (one principal tells of keeping children in the building overnight rather than authorize bus travel under hazardous conditions). It takes time to clear the roads of snow. Fortunately, schools need be closed only rarely. In 1981-82, weather caused only eight school days to be missed, and four of these were made up. But when we recall further the fact that each of the districts operates under a slightly different calendar, we can begin to appreciate the problem of keeping the buses running, getting the children to the school on time, and managing the complex schedules that have teachers meeting students when and where they should.

It seems unlikely that the transportation problem will be amenable to any easy solution--or any solution at all. Rural areas are characterized by geographic dispersion and low density population. If for no other reason than the former, children will have to be transported. The latter condition suggests that when low incidence handicaps are aggregated over a low density population, some children will have to suffer even greater transportation woes to collect up a sufficient number of them and get them to where a suitable program exists. Computer scheduling might help; having the LEAs move to a common schedule would be a blessing! But busses seem to be a permanent fixture.

9. Problems of Itinerancy. Itinerancy occurs whenever the service offered is responsive to a low-incidence condition. In even major urban school systems, it is not uncommon to find teachers who are effectively itinerants: speech therapists, adaptive physical educators, and so on. If a low incidence condition is combined with a low density population, as is common in rural areas, itinerancy of service personnel is likely to spread to other services that in a large school system might be located in virtually every building. And in the country, the service providers have a lot further to go between stations!

The itinerants of the Riverhill Cooperative are pressed in three ways as a result of the roles they fill: psychologically, logistically, and administratively. Psychologically, they lead a kind of "marginal man" existence--they have no real "home," unless you count a desk at the Cooperative as such, nor are they accepted as "part of the family" in the schools in which they spend their time. They are transients--akin to the student "transports." A few have no sense of belonging and have to manage without much colleague acceptance. They are an outgroup even with their students, who recognize that they are unlike their "regular" teachers. Even their professional integrity may be challenged--they may be seen as helping lazy students slide through school. It is little wonder that they feel stigmatized and powerless. The conditions are ripe for what sociologists call "alienation." Of course, the extent to which a given teacher will find itinerancy and its associated conditions psychologically burdensome is largely determined by that teacher's personality. One can regard the inherent difficulties as insurmountable hassles or simply as part of the job--something that comes with the territory. The teacher who can display flexibility and is willing to negotiate will find the difficulties much less burdensome than one who defines the role relatively rigidly and places professional considerations beyond the pale of any negotiation. Further, there are useful trade-offs for the experience of alienation: one might not feel part of the family, but at the same time one need not assume any of the obligations of family membership. And one can feel part of the Cooperative family if not of the school family.

The itinerant is also pressed logistically. His or her professional life rotates about the calendar. All of life is one big schedule. Teachers need to know when Johnny will be taken out. Johnny needs to know. The Cooperative needs to know where you will be and with whom--and why. The principal needs to know. And this schedule rotates in turn about time-on-road, which gobbles up a big proportion of one's daily allotment of time. Interspersed are other logistical factors: where will one find time and place to meet with one's paraprofessional to plan, to check progress, just to get to know one another? And how will one manage to find the materials that are desperately needed for that new case that came up this morning? Are there some relevant items in the school library? Back at the Media Center? Out in the car? Clearly the extent to which the itinerant will feel logistically pressed depends on the number of schools to be served. Two seems to be quite manageable, but five is certainly too many.

Finally, the itinerant is pressed administratively. He or she has two masters--the Director and the principal. Both seem to feel (and it is clearly the case) that they have the right to program the itinerant. The attitude of the principal is clearly determinative here. There is also the struggle for communication and control with the regular teacher. Who decides what and how to teach? What grade to give? Why does it turn out to be so necessary to spend a large portion of one's energy doing PR work in the building, trying to persuade everyone with who one must work that being an itinerant doesn't mean you cannot be trusted--or have lost your common sense?

Ironically, the itinerant service delivery model will always be needed in rural areas--even to supply what might in urban centers be thought of as common services. The role cannot be abolished, nor can it be substantially changed. But there are some actions that can be taken to make the itinerant's load somewhat easier. First, the unusual aspects of itinerancy need to be given public recognition; the itinerant should be seen as someone special who is willing to undertake all of these burdens even knowing about them in advance. This recognition can best be given by a salary differential. Support services should be provided --particularly psychological support services. Sometimes these can be best provided by the "victims" themselves, if opportunity and encouragement are provided for them to exchange "war stories" and provide mutual encouragement. The demanding nature of the task can be recognized in reduced loads. So far, the Cooperative seems not to have done any of these things.

10. *Getting and Keeping Qualified Personnel*. Special education teachers (with the possible exception of EMR teachers) are in short supply everywhere, particularly since the advent of P.L. 94-142, but the shortage is experienced especially hard in rural areas. We have already reviewed personnel problems in some detail, and have seen that:

- Teachers are hard to attract to the Cooperative because of low salaries and low salary increments (a function mainly of the inadequate resource problem described above), the higher certification requirements in Riverhill County as compared to the state immediately across the bounding river, the relative closeness of the county to urban areas which are more likely to attract personnel, and the lack of appeal of rural life to many who have not experienced it while growing up.

- Teachers are hard to keep in the Cooperative because of the lack of privacy (a goldfish bowl existence), the unattractiveness of working in small schools with minimal facilities, equipment, and materials, the overwhelming paperwork burden, the unpleasantnesses of itinerancy, the truncated social life, the value conflicts with the local culture, and a general lack of understanding and respect from the community.

As a result, teachers suffer burnout, or they become easy targets for better offers in more desirable settings, particularly after they have gained some experience in the Cooperative and so become more valued.

We have also seen that both teachers and the Cooperative Director have developed coping strategies for dealing with these problems. Thus the majority of teachers tend to develop closed social patterns that include only one another (they "pal around together"), live outside Riverhill County, leave the area whenever possible and often on weekends, and during the week immerse themselves in a variety of activities, such as church activities, to escape. But it is clear that these strategies do not eliminate the problems but only tend to hold them in abeyance; the need to use such strategies itself becomes a repugnant "hassle." Sooner or later teachers may look for a more decisive way of dealing with these problems, and that may mean leaving.

The Director, we have noted, has devised some coping strategies of his own. He endeavors to recruit persons who have a preference for the rural life; indeed, he seeks to persuade persons already committed to the area to become retrained to be special education teachers. He encourages staff to seek additional training at nearby universities. He provides a $400 annual "personal budget" which teachers can spend as they like to support their professional styles. He makes necessary "deals" with the State Department of Education to secure certification waivers so that interested persons can "learn on the job" and be paid and trained while doing it. He seeks out ways to challenge his personnel; to confront them with "significant emotional events" that will "turn them on." He often provides split assignments to help alleviate burnout and overcome the boredom of a single task.

The Director may be one of the more creative cooperative directors when it comes to dealing with the personnel problems. There can be no doubt, however, that recruitment and retention will continue to be a major issue, one that is very much exacerbated by the rural setting. It seems unlikely that whatever may be done, rural cooperatives are not in the best bargaining position nor will they be. It is a tribute to the personal commitment of the personnel who do work for the Cooperative that they provide the level of quality service which they do.

11. Local Traditions and Practices. Riverhill County exhibits a strong local culture which is not atypical of the rural life style. Among the more compelling components of that style are such elements as a strong feeling of self-sufficiency, a drive for autonomy, intense feelings of local pride and local identity, the dominance of rural morality, and the concept of "neighboring" as a way of tackling problems with "togetherness."

The five member LEAs are small, and given the national press toward consolidation, it is not surprising that suggestions have been made from time to time that these districts should consolidate--if not into a single county system perhaps into two LEAs. There has been some discussion of a possible merger between Media and Hillcrest, but no steps have been undertaken even to fully explore the possibility, not to mention consummating it. The Media district proposal, combining three tiny former LEAs, was defeated at the polls three times before final acceptance. A recent Post-legislative Audit suggestion that Rivertown should seek consolidation was coldly received. None of these facts would suggest that in Riverhill County we have LEAs interested in much else than maintaining their autonomy.

Given that context, one could confidently have asserted that the suggestion that there be a Cooperative would not be universally embraced with joy. Indeed, as we have seen, the Cooperative is more often seen as something that was "laid on" the local districts, and therefore something that challenged and undermined local control. It seemed to be the case that a cooperative arrangement could not be avoided if the requirements of 94-142 (and the analogous state requirements) were to be met, but the locals surely did not have to like it nor could they be expected to cooperate beyond the bald letter of the law.

It would be a mistake to believe that that spirit has continued in full flower as the style of operation of the Cooperative has become clear and as its successes have mounted. Yet it is also the case that the strong need to maintain local autonomy has had its effects. For example:

- The interlocking governance arrangements on which we have commented several times seem to be directed toward maintaining and protecting the status quo. The major function of the Cooperative Board seems not so much to be to provide policy guidance as to "watch out for local rights." But of course, that is hardly an unreasonable posture for Board members to adopt, who will represent local interests if they do not?

- The failure of the LEAs to agree on a common schedule (an easy thing to do when the issue was limited to the sports schedule) can be seen as one way for the LEAs to assert their local authority.

- The rejection of the Cooperative teachers (and especially the itinerants) as outsiders, and the inability to absorb them into local social structures, is further evidence.

- The unequal referral rates from the members, with Teague, the original "host agency" LEA in the days when the Cooperative was voluntary, dropping to 7.11 percent against the average of 11.02 percent referrals (as contrasted also with Rivertown, which sends 16.85 percent of its youngsters) may also be interpreted as one index of resistance. So also the increased "cure rate" occurring when children move from elementary to junior high levels.

- The distinction the LEAs sometimes draw of "Your Kids, Our Kids," or the attitude of some caught up in the question, "Why should we pay for kids who are not own?" may also be cited as evidence.

Clearly the Cooperative faces a political situation which is essentially beyond its control, a set of "contextual factors" which the Cooperative cannot change but which have great impact on and significance for it's operation. These factors cannot be ignored as "merely political," for they shape the Cooperative's environment and must be reckoned with. Indeed, even if the Cooperative could intervene to change these factors, it might well take counsel before doing so, for who is to say that the Riverhill County values are inferior or constraining? If one takes the proposition of local control of education seriously, the people of Riverhill County not only have the obligation to decide but its agents, the Cooperative among them, have an obligation to listen and respond.

The Director's strategy seems to be to work within the system, but informally, as evidenced in his weekly "coffee and chat" circuit, his clearance of proposed actions with the superintendents before bringing a matter up with the Cooperative Board, and his sensitivity to local mores. His aim seems to be less to confront the Board with a fait accompli than to have determined their level of support before acting--and acting only when he knows he has gained their support. That this strategy is both safe and sound is evidenced in the not inconsiderable progress that the Cooperative has made in but three years time.

What Can Be Learned from the Case?

In the preceding pages we have attempted to give the reader a "feel" for what it is like to live in the Riverhill County Educational Cooperative; to provide a vicarious experience as seen through the eyes of the local participants. If we have been successful in providing such a "thick description," the reader by now will feel quite familiar with the Cooperative, its circumstances, and its problems.

It is time to ask the question, "So what?" What can one make of all this? Is there anything to be learned? There are of course many lessons--although the reader should be careful not to assume that these lessons are generalizable to other cooperatives indiscriminately. Indeed, a further reason for providing a thick description is to make it possible to reach a judgment about the degree of similarity between Riverhill and any other site to which a reader might wish to transfer the findings. If there is a high degree of similarity, transfer might be appropriate--but even then caution will be the best weapon of the prudent.

No doubt the reader will already have drawn many lessons for himself or herself, depending on particular interests or concerns. The purpose of this section is not to point to all possible lessons but to focus on a few that seem to be of special importance. The particular selection is of course a subjective matter, but it has not been made haphazardly.

Instead its seeks to emphasize those matters that seem particularly salient at the site itself, or that are of special national interest at this particular time.

The narrative began with a brief description of five local school districts, all located in a single county, Riverhill, that are banded together in an educational cooperative mainly but not solely for the purpose of providing services for exceptional children. Each of these districts had, historically, dealt with these children as well as it could, on its own. But the services that were provided were undoubtedly inadequate. And it is probably the case that numbers of children were not served at all, because parents were ashamed to admit their existence, because they knew that the schools would be unable to help them (perhaps not able even to enroll them), and for a variety of other reasons. Of course, there is no concrete evidence that this was the state of affairs in Riverhill County, but it is plausible to surmise that it was for two reasons: because that's the way it was almost everywhere else in the United States; and because, as it became clear that something like P.L. 94-142 was just over the horizon, the five districts formed themselves into a voluntary cooperative to get things going in special education. Apparently the leaders of the several LEAs realized that they could not, independently, provide the level and character of service that would soon be mandated. And so we learn from Riverhill

> LESSON 1: ORGANIZATIONS COME TO WILL WHAT THEY PERCEIVE IS TO BECOME MANDATORY: ACTION IS GALVANIZED BY ANTICIPATION, OR NECESSITY IS THE MOTHER OF INVENTION.

In Riverhill County, it is plain that it was better to have P.L. 94-142 than not to have it, for it forced attention on the problem of special education in ways that probably would not otherwise have occurred. To the eternal credit of all concerned, however, the move to cooperate antedated the law rather than followed its passage.

In due time P.L. 94-142 was passed. In this state, several laws already existed foreshadowing 94-142, and in at least one area of exceptionality--the gifted--going beyond Federal requirements. But now the five local districts felt compelled to constitute themselves into a form of organization authorized under state law. These five vigorously autonomous districts felt their control being eroded, felt pressed, felt dictated to. They felt as Media's three precursors felt when moved to consolidate (recall that that proposal was rejected three times at the polls before final passage), and as Riverhill feels even now at the suggestion from the Post-Legislative Audit Committee that it consolidate. And so we learn

> LESSON 2: WHILE FORMING A COOPERATIVE MAKES POSSIBLE MORE ADEQUATE SERVICE FOR THE HANDICAPPED, IT TAKES FROM LOCAL DISTRICTS A SUBSTANTIAL PORTION OF THEIR AUTONOMY AND CONTROL. DE FACTO, POCKETS OF DISAFFECTION ARE FORMED. THE POTENTIAL OF ADDED OR BETTER SERVICE THAT MIGHT ACCRUE IN FORMING A COOPERATIVE MUST ALWAYS BE WEIGHED AGAINST THE POSSIBLE POLITICAL IMPACT OF DISAFFECTION AMONG POWERFUL STAKEHOLDERS.

Well, there didn't seem to be much that one could do about it. Cooperation certainly was needed to meet the mandates, and only certain forms of cooperative action were legally acceptable. So on with it! But forming into a Cooperative certainly did not mean that the local districts must give up all control. And certainly, more than a mere vestige of control is retained under the Cooperative governance system, in which Cooperative Board members are elected by each LEA Board, one-on-one; the LEA superintendents sit as *ex officio* Cooperative Board members and serve as advisors to the elected members, one-on-one; the Director himself is a former superintendent from within the County who knows the area, its customs, and its fears, and who can be counted on to understand; and when the entire fiscal structure is posited as much on the rural concept of "neighboring" as on anything else. The state may well set the parameters for cooperation but the locals still determine the implementation within those parameters, a posture significantly eased by the "loosely-coupled" organization both within LEAs and between LEAs and the Cooperative. And so we learn

> LESSON 3: TOP-DOWN MANDATES WILL BE OBEYED WITHIN THE LETTER OF THE LAW, BUT LOCALS WILL STRIVE FOR AS MUCH ELBOW ROOM AS POSSIBLE IN ORDER TO PROTECT THEIR OWN INTERESTS AND CONTINUE SO FAR AS POSSIBLE IN THEIR TRADITIONAL OPERATING SYTLES.

Once the Cooperative was started, it set a variety of activities in motion. It took over all of the previous special education programs from its members LEAs, and reformulated them into the present program structure. It reached out in child-locater activities that not only brought more youngsters in for service, but also youngsters of types that had not been served in the past. Agencies were enlisted to help the Cooperative both to identify clients and to evaluate and diagnose them. Some programs simply could not be mounted even with the Cooperative's expanded resources, and so contracts with neighboring facilities were let. Projects were undertaken which got the Cooperative into collaborative arrangements with other cooperatives in the state. From all of this we learn

> LESSON 4: COOPERATIVES FACILITATE THE INVOLVEMENT OF INDIVIDUALS AND AGENCIES BEYOND THEIR OWN MEMBERSHIP. THEY PROVIDE THE CAPABILITY NOT ONLY TO PULL TOGETHER BUT TO REACH OUT: THEY HAVE A MULTIPLIER EFFECT IN FOCUSING RESOURCES ON THE NEEDS OF LOCAL HANDICAPPED YOUNGSTERS.

The Cooperative soon became involved in ventures that were not, strictly speaking, necessary to provide the services mandated under P.L. 94-142. Projects like the Careers Orientation Project, the Vocational Sexism Project, the Sheltered Workshop, and especially the Drivers for Special Buses Project, have obvious programmatic implications, but go beyond those in several ways: they provide additional dollars which permit hiring a staff of greater scope and background than would otherwise be available; they are a source of new ideas feeding into the normal change processes of the Cooperative; they can be used to provide challenges to staff and help to relieve the boredom of their everyday tasks. Thus we learn

LESSON 5: COOPERATIVES CAN CREATE A SYNERGISM BETWEEN PROJECTS AND PROGRAMS THAT YIELDS MORE DOLLARS, BETTER IDEAS, AND ENERGIZED AND EXCITED STAFF.

All the activities in which the Cooperative engages are not played out on a blank canvas. A variety of constituencies continuously scrutinizes its every act. Many of these constituencies, or stakeholding groups, have been described and cited in this case study; they include school officials, teachers, parents, community members, taxpayers, state and national officials, and yes, even the children themselves. It would be absurd in the present heavily pluralistic culture of these United States to believe that all these groups saw eye-to-eye on what the Cooperative should be doing; indeed, the opposite assumption, that there come into play many different value systems, in conflict with one another to some extent, is a great deal more tenable. If one believes in decentralization, and in the wisdom of local determination, it is especially difficult to insist that the "national vision" must necessarily hold sway in every community of this country. On the other hand, our citizens do hold certain rights, and our own history is too rife with illustrations of how those rights may be trampled not to give one pause. And so

LESSON 6: THE COOPERATIVE MUST DO ITS WORK IN A SEA OF CONFLICTING VALUES. ITS PROGRAM MUST REFLECT A COMPROMISE BETWEEN NATIONAL IMPERATIVES THAT INCLUDE THE PROTECTION OF BASIC RIGHTS AND LOCAL DETERMINATION OF WHAT IS FEASIBLE AND APPROPRIATE IN THAT SETTING.

If compromise is needed, how can one avoid politics? As is so often the case (and equally often avoided or denied in research studies), political actions are the linchpins that keep the wheels on successful programs. That this should be so should certainly come as no surprise to the national lawmakers who often tailor a bill to be deliberately ambiguous so as not to lose contituents. If ambiguity is a key device in the writing of laws, it is also a key in their administration and implementation: the ambiguity provides the ncessary flexibility within which local political interests can hammer out their compromises. To be sure, some of the local political interests are "undesirable" (is that not also true at the national level?), and it may be unfortunate that the system encourages, indeed requires, compromises that these elements can live with too. But it is the nature of power that groups that have it cannot be shunted aside. And so we learn--if we didn't know it already

LESSON 7: POLITICS COUNT. LOCAL NEGOTIATIONS AND COMPROMISES WILL BE AS DETERMINATIVE OF PROGRAM AT THE LOCAL LEVEL AS NATIONAL NEGOTIATIONS AND COMPROMISES ARE DETERMINATIVE OF MANDATES AT THE NATIONAL LEVEL.

And while we're on the subject, let's not overlook the state level either.

If politics count, then politicians are key. And at the Cooperative, key personnel make the difference in the operation. We have reviewed in some detail the Director's operating style: as change agent, as "assistant coach," as a political force, as the "eyes and ears" of the oganization, as its leader. Much less has been said about the school psychologist, who occupies the unchallenged second rung on the organizational leadership ladder. If the Director might be characterized as "Mr. Outside," the psychologist is certainly "Mr. Inside." It is he who keeps the work load moving, the channels of communication open, the daily emergencies under control. Many informants credit him with having turned the Cooperative around. And of course the interactions of individuals on a face-to-face operational level in the final analysis "drives" the whole system. So we repeat a lesson which has already been learned so often as to be terribly redundant, but is nevertheless true:

LESSON 8: PEOPLE MAKE THE DIFFERENCE.

At times it takes a considerable effort before a role incumbent is able to exert the influence appropriate to the office he or she fills. Other actors on the scene will continue to define the role in terms of the performance of the current incumbent's predecessor. If that predecessor happened to be somewhat ineffective, the new incumbent must first work at erasing the negative image so created. So, in Riverhill County, the new school psychologist, the new gifted coordinator, and several itinerant teachers had to overcome the shortcomings of their predecessors before being able to establish their own "track records." One can expect that the teacher eventually appointed to replace the resigned ED teacher will have a similar problem. On the other hand, if the predecessor incumbent happened to be unusually effective (or was so perceived), the new incumbent will have to demonstrate the ability to "fill the shoes" of the giant. Thus:

LESSON 9: ROLES ARE LARGELY DEFINED BY THE PERFORMANCE OF EARLIER INCUMBENTS. REPLACEMENTS MAY HAVE TO OVERCOME NEGATIVE CONSTRUCTIONS OF THE ROLE IN CASES IN WHICH THE PREDECESSOR'S PERFORMANCE WAS POOR, OR MAY HAVE TO LIVE UP TO IMPOSSIBLY HIGH STANDARDS IN CASES IN WHICH THE PREDECESSOR'S PERFORMANCE WAS (PERHAPS APOCRYPHALLY) UNIVERSALLY APPLAUDED. INCUMBENTS MUST DEVOTE CONSIDERABLE ENERGY TO "CLOSING OUT" CONSTRUCTIONS BASED ON EARLIER PERFORMANCE BEFORE THEY CAN REDEFINE THE ROLE IN THEIR OWN TERMS.

The Cooperative, we see, is required to conform to many mandates, but it gets very little help in carrying them out. Definitions of handicapping categories are very different from state to state, but the Cooperative gets little guidance in sorting them out. The state may mandate early childhood identification measures but fail to provide for program to serve than who are identified. IEP forms not only vary from state to state but within the state almost with every printing (indeed, some printings are made because the forms are changed). Staff are charged to carry out esoteric processes such as needs assessment and evaluations, but there are neither adequate guidelines nor technical assistance to show them how. Their situation is very much like the invitations the late comedian Joe Penner issued on his once-famous radio show, "Let's have a duck dinner. You bring the duck!" And so

LESSON 10: MANDATES ARE FREQUENT BUT GUIDANCE IS RARE. LOCALS ARE ON THEIR OWN TO DIVINE WHAT IS REQUIRED AND HOW TO PROVIDE IT.

Now the Cooperative has one very clear mandate: to provide a free appropriate public education in the least restrictive environment possible. But it must carry out this mandate *in Riverhill County*, in available facilities, with whatever personnel *can be recruited*, given the salary levels and the working conditions extant. Under those constraints it is simply not possible to do what the law commands, however well-intentioned the actors may be. Adjustments must be made. The local implementers can be counted on, indeed, are forced, to seek out and exploit every bit of flexibility that exists, and perhaps to cut other corners besides. So we witness the emergence of prestaffings. The Cooperative stops short of mounting due process hearings. The system quietly refuses to find and refer more children than it can handle. The State Department is petitioned for certification waivers (and it accedes because it doesn't know what else to do either). Inter-related Learning Centers are replaced with self-contained classrooms. The school day is "shortened" because bus rides must be long. LD teachers make "deals" with regular classroom teachers about grading to avoid a lockout. Many such "adjustments" are made, not for the sake of *avoiding* the mandate, but *to carry out as much of it as is possible* under the condition and constraints that exist. It seems the "eyes" of the lawmakers are often bigger than the "stomach" of the system can accomodate. Thus we learn

LESSON 11: POLICY-IN-INTENTION AND POLICY-IN-IMPLEMENTATION ARE NOT IDENTICAL. THE LATTER AT BEST APPROXIMATES THE FORMER AND MAY DIFFER SIGNIFICANTLY FROM IT.

So we see the Cooperative staff struggling with the same problems that confront their counterparts all over the country: trying to understand what the law means, allocating appropriate resources, hiring, training, and supervising teachers and other service personnel, dealing with deficiencies, shortfalls, and unexpected side effects, and trying, all the while to keep politically cool. Is it reasonable to expect, under such circumstances, a flawless operation? Surely not. Certainly some things go well--and what the Cooperative is doing well has been documented here--but other things will turn out to be mediocre, and still others will not work at all. And so

LESSON 12: THE RECORD OF SUCCESS, EVEN IN WELL-MANAGED ORGANIZATIONS OPERATED BY WELL-INTENTIONED PEOPLE, WILL BE A BROKEN FRONT, RANGING FROM THINGS ACCOMPLISHED EXCELLENTLY WELL TO THINGS NOT ACCOMPLISHED AT ALL. NO HUMAN ORGANIZATION COULD DO OTHERWISE.

But all of the "lessons" learned so far have been drawn out with no reference to the fact that Riverhill is a *rural* county. All of the problems that might be faced in any context here are exacerbated by two indigenous rural problems: distance, and low population density. Many of the handicaps are low-incidence problems--even the more widespread handicaps such as EMR will comprise only a small fraction of the population. When low incidence is combined with low density population, the result is a sprinkling of cases that, in a rural area, is difficult to assemble for service and expensive to serve when collected. The other problems we have recounted that are also compounded in a rural area, such as itinerancy and recruitment and retention of staff, of course simply add to the difficulties. Hence we learn

> LESSON 13: WHATEVER THE PROBLEMS OF SERVING THE HANDICAPPED MAY NORMALLY BE, THEY ARE EXACERBATED SEVERAL-FOLD IN RURAL SETTINGS.

Cooperatives are usually formed, and certainly were formed in the case of the Riverhill Cooperative, because as organizations they can accomplish desired goals that cannot be accomplished by the members singly. There is no doubt that the Cooperative is functioning at a considerably higher level of service for the handicapped than any of its member LEAs could alone. But the problems we have reviewed in the body of this case study, and the "lessons" we have summarized above, make it plain that the Cooperative is an insufficient solution to the problems posed in delivering services to handicapped youngsters in rural areas. Thus we learn

> LESSON 14: THE COOPERATIVE IS A NECESSARY BUT NOT A SUFFICIENT RESPONSE TO THE TASK OF ADEQUATELY SERVING HANDICAPPED YOUNGSTERS IN RURAL AREAS. MORE IS NEEDED.

P.L. 94-142 is a particularly difficult piece of legislation to implement because it represents such a dramatic departure from past practice, because it (apparently) fails to consider local capacity, because it is underappropriated (surely in Riverhill County), and because it is missing some essential features that would help many of the problems encountered by the Cooperative, and, no doubt, its counterpart agencies all over the country. Many of the most difficult problems, such as proper interpretations of the law, the paperwork burden, and low level of resources, are beyond local control, comprised of "contextual factors" determined elsewhere. Locals cannot provide the additional resources that might be needed. They cannot change certification standards. They cannot change child-find criteria or IEP forms. They cannot change community attitudes--certainly not in the short haul. And so on. If they are expected to solve the problems of the handicapped they must be helped to do so--and helping implies changes in policy. And so

> LESSON 15: THE TOOLS NEEDED TO SOLVE THE PROBLEMS OF SERVING THE HANDICAPPED MUST BE PROVIDED, IN THE MAIN, BY CHANGES IN POLICIES. POLICY-MAKERS AT EVERY LEVEL --FEDERAL, STATE, AND LOCAL--MUST BECOME ACTIVELY INVOLVED IN A CONCERTED MANNER IF PRODUCTIVE CHANGE IS TO OCCUR.

We can also learn, from the Riverhill experience, that wherever policies may be enunciated, it is at the state level that they become operationally visible to the locals. Riverhill County officials are hardly aware of the Washington scene, and have very little knowledge about how policy makers are, or could be, influenced at that level. But they are acutely conscious of state-level officials. It is from the state that they receive instructions with which they must comply; it is a state official who approves the local comprehensive plan and thereby provides access to flow-through funds; it is the state department that mounts monitoring teams and the state Post-Legislative Audit team that reports on compliance; it is state law that is referenced in the Cooperative Agreement--not 94-142. And the Cooperative administrators know very well how to deal with state officials; they are at home prowling the corridors of the state office building and have viable contacts throughout the State Department of Education, not simply with the special education division. And so

LESSON 16: AS POLICIES ARE FORMULATED, THEY MUST BE CAST INTO A FORM THAT MAKES THE STATE A CHIEF ACTOR AND LIAISON, FOR THE STATE IS THE MOST VISIBLE AND MOST POWERFUL CONTACT FOR THE LOCALS WHO ARE SERVING THE HANDICAPPED.

In the final analysis, all of the laws, policies, guidelines, and activities come to a focus on the ultimate client--the handicapped youngster being served. That youngster certainly knows little if anything about how the service happens to get to him or her, and frequently, the parents know little more. But they do experience the service, and from that experience draw their own implicit or explicit impressions of policy. If policy-in-intention is different from policy-in-implementation, policy-in-experience is surely different from both. Consider the case of the ED-diagnosed youngster whose mother shared her constructions with the research team. While this case is surely not typical (what case ever is?), it does illustrate how wildly different the three levels of policy can be. First, we have the Cooperative recognizing that ED is a state-mandated program (policy-in-intention at the state level) and moving to design a course of action to mount such a program with all due speed. Indeed, a planning year is provided under the guidance of a state-licensed ED teacher, who proposes a specific plan for implementation (policy-in-intention at the Cooperative level). Unfortunately contingencies arise: the planning teacher suddenly leaves the district; the room designated for the program is not completed in time for the beginning of the school year; the teacher who is finally hired to run the program is neither fully certificated, trained, or experienced; an unfortunate transaction occurs between the teacher and one of the pupils in her charge. The policy is bent (policy-in-implementation) and indeed, the program is completely abandoned. The mother in question, already concerned because she feels that promises made to her have not been kept, experiences the policy as a deliberate decision on the part of the Cooperative and the involved school district not to mount an ED program (policy-in-experience). And so

LESSON 17: POLICY-IN-INTENTION, POLICY-IN-IMPLEMENTATION, AND POLICY-IN-EXPERIENCE ARE ALL DIFFERENT FROM ONE ANOTHER. SLIPPAGE OCCURS BECAUSE OF PRACTICAL

CONTINGENCIES MUCH MORE OFTEN THAN BECAUSE OF INCOMPETENCE OR EVIL INTENTIONS. POLICY-MAKERS SEEKING TO CORRECT DEFICIENCIES ARE WELL ADVISED TO CONCENTRATE ON REMEDYING THE CONDITIONS PRODUCING SLIPPAGE RATHER THAN ON CENSURING OR PENALIZING POLICY IMPLEMENTERS.

It is just this tendency for policy-makers and monitors at all levels to censure or penalize that produces a heavy emphasis on compliance at the local level. Indeed, the most important factor in the operational lives of Cooperative staff sometimes seems to be the need to leave a "paper trail" justifying virtually every act. The term "compliance paperwork" is commonly heard; many staff go well beyond the formal requirements in their efforts to document what they do. The waste of time and effort is prodigious. Further, the effort to give the appearance of compliance is seen at every level; thus, the very wording found in the local comprehensive plan parrots the wording of the state plan, and mechanisms are highly developed on paper, for example, the due process hearing steps, even though they may never be used, simply because the state plan requires that they be spelled out. And as we noted with respect to the site visit made to the Cooperative by a state department monitoring team, the "checklist" used by them exhibits less interest in the quality of program or service than in the fact that they exist in the prescribed form. The preoccupation with compliance is not helped, in this case, by the fact that the monitoring team made "findings" that were factually incorrect, a situation that certianly reinforced the feeling of the locals that it is crucial to maintain documentation. And so

LESSON 18: LOCAL IMPLEMENTERS AND AGENTS LIVE IN A "CLIMATE OF FEAR" BROUGHT ON BY AN OVER-EMPHASIS ON COMPLIANCE AND LEGAL RETRIBUTION. SUCH A CLIMATE IMMOBILIZES CREATIVE RESPONSES, STUNTS FLEXIBILITY AND ADAPTABILITY, AND, IN THE END, PRODUCES A BUREAUCRACY THAT FUNCTIONS IN THE BEST "CATCH-22" TRADITION.

If, finally, one poses the question, "Are the purposes of P.L. 94-142 being met in Riverhill County?" one would have to venture a guarded "only partly." But in view of the lessons learned so far, one is hardly in a position to fault solely the locals for that partial failure. Of course one might argue that staff could be better trained; governance could be more prudential; facilities could be better utilized; and so on. Any operation can be improved. But most of what ails the Cooperative is brought on by contextual factors rather than internal lapses.

At the same time, there is little doubt that P.L. 94-142 has had a salutary effect on the delivery of services to the handicapped in Riverhill County. While the member LEAs did recognize their responsibility, even to the extent of forming a voluntary organization for dealing with it, it is dubious whether the effort would have reached its present level without the impetus provided by the Federal legislation. It is undoubtedly also the case that the Cooperative has fallen short of what Federal policy makers, parents, advocacy groups, and indeed, Cooperative staff themselves, might have wished for. There is a long way to go to meet the ideal of 94-142 to provide a free appropriate public education in a least restrictive environment for every handicapped child. And so a final lesson:

LESSON 19: LAWS CAN MANDATE BUT ONLY HUMAN AGENTS CAN IMPLEMENT. LAW MAKERS ARE WELL ADVISED TO UNDERSTAND THE REALITY FOR WHICH THEY LEGISLATE RATHER THAN SIMPLY TO LEGISLATE FOR THE REALITY THAT THEY WOULD LIKE TO HAVE.

Epilog

The information on which this case study is based was collected during the Fall of 1981--a year prior to the time at which the case study was actually written. A draft of the case study was taken back to the site in the Fall of 1982 for the purpose of soliciting reactions from a selected group of locals, who served as member checkers for credibility and provided additional information to fill in gaps which had been identified in the writing process. Not surprisingly, the situation in Riverhill County had progressed beyond its status of the year before. Several of the changes are worth noting briefly:

* The Agreement which expired at the end of the 1981-82 school year had been extended for an additional two years without change. The extension was completely unexpected in view of the widespread discussion of and apparent strong sentiment for basic change, at least in the funding formula, which everyone seemed to agree was inequitable.

* The era of parent quiessence seems to have ended. While in the Fall of 1981 the Cooperative personnel could say with pride that no one was sufficiently disaffected with Cooperative services to bring a court case, there are now several cases pending.

* The Legislative Post-Audit whose findings were turned over to the state legislature in March 1982 and which were expected to contain strong recommendations for consolidation of at least the Rivertown district with one or more others in the county turned out to be an innocuous document.

* The contract with the adjacent county to provide services for severely handicapped youngsters has not been renewed; instead, the Cooperative has instituted its own program and hired a teacher for that purpose. Thus the earlier judgment that the county did not have sufficient resources to mount such a program has been reversed.

* The ED program allowed to lapse in the Fall of 1981 has not been replaced, as then expected, by a kind of crisis-intervention mechanism. Instead, a new Interrelated Learning Center (a room simultaneously serving the needs

of EMR, LD, and ED youngsters authorzied under state law) was established. In view of the earlier experience of the Cooperative in attempting to operate such a room for EMR and LD students--an arrangement which was abandoned in part because of objections from LD parents who felt that their children were being stigmatized--this move is quite unexpected and surprising.

- The anticipation that a contract for custodial services would be signed between the Cooperative and the sheltered workshop has been realized. Clients of the workshop, who can now be encountered throughout the Cooperative building, seem gratified by the new work they are able to do, while Cooperative personnel seem pleased by the quality of service provided and the opportunity to interact on a daily basis with sheltered workshop clients.

These changes suggest a truism about cooperatives that undoubtedly also holds for organizations of many types: they are in continual flux. Now we might have said that organizations undergo continuous change or development, but these latter terms suggest a much more goal-oriented, planned, convergent process than actually seems to occur. The research team does not have data about these changes, nor is it in a position to suggest why they occurred, but it does seem clear that, by and large, the changes were unpredictable (at least by us). They seem to have been shaped by contextual and opportunistic factors as much as by rational decision-making. Organizational futures unfold, and when they do, their form is often an enormous surprise to all, including the chief actors in the situation.

That the world we all live in is a probablistic and not a deterministic one is a conceptual truism whose empirical ramifications are rarely appreciated--or anticipated. Here in Riverhill County we have a good example of what such unfolding can mean. Given the data of 1981, any reasonable observer would have predicted that: the new Agreement would contain a funding provision based on actual per-pupil costs for each program; parents would continue to accept the "authority" of school personnel; the legislative post-audit could have made a strong case for consolidation; services for severely handicapped youngsters would have been continued through contracts with neighboring counties; and the ED program situation would have been resolved through a crisis-intervention program model. The only prediction among the six that one is likely to have made in consonance with actual future events is that the Cooperative would contract with the sheltered workshop for custodial services. All of the other problems have been resolved in unexpected and improbable ways.

Persons who expect to generalize from this case study (or from research data however collected) may draw an important lesson from this outcome: generalizability is relatively meaningless even within an apparently stable situation. How much more careful must we be in applying the information from one site, at one time, to another site, at another time?

It will be tempting to the skeptic to assert that the unpredictability we have noted is traceable less to the inherent non-generalizablity of data than to the sloppiness of our methods, which produce unstable information generally invalid even for the site at which it was collected. But of course, it was a major purpose of the third site visit to check the raw information which we had earlier collected, as well as our interpretations of it, with persons much more intimately familiar with the site than we. It seems appropriate to close this case with a few quotations from those locals who helped in the member check:

> The Cooperative Director: "Good overall credibility. That is talking about how [the Cooperative] works."
>
> The Assistant Director: "Reading this caused me to re-evaluate my own position. This is the way it looks to an outsider."
>
> An LEA Superintendent: "Basically it is authentic."
>
> A governing board member: "Wonderful! The community should read it to understand the Coop."
>
> A school principal: "An outstanding document--raw honesty. Sometimes when I read a research report about a situation I know, I say, 'Man, did they dress this one up.' But everyone wore plain clothes in this report. It is interpretative, understandable, realistic."
>
> An itinerant teacher: "The overall itinerant picture is fair and accurate."
>
> A regular teacher: "I was overwhelmed by the insights and the way that you wrote it. I developed an appreciation for the Coop that I never had before." But, she added, "It is a put-down to our way of living."
>
> A parent: "I think you give the reader a bad picture of our county."

It would be neither fair nor appropriate to claim that all of the reviewers' comments were so positive and supportive. Indeed, the observation of the parent and of the regular teacher regarding the "feeling tone" which we had built in about the quality of life in Riverhill County attests to the fact that we researchers, without a day's experience in rural living among us, were unable to develop a real appreciation for the life style we saw laid out before us. As the Director put it to us in an aside, "We're living what you all admire so much in paintings of rural America!" But insofar as our analysis of Cooperative operations and of the problems faced by local personnel is concerned, it seems that the case study did no violence to what the locals themselves experienced and felt. The locals found the document acceptably credible.

Appendix D

Site #2 Case Study

The Midland Regional Education Agency

THE MIDLAND REGIONAL EDUCATION AGENCY:
A CASE STUDY

The second of five case studies appended to
Interorganizational Special Education Programming in Rural Areas:
Technical Report on the Multisite Naturalistic Field Study

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

February 22, 1983

© 1983

Department of Special Education
School of Education
University of Kansas
Lawrence, Kansas 66045

"The work upon which this publication is
based was performed pursuant to Contract No.
400-81-0017 of the National Institute of
Education. It does not, however, necessarily
reflect the views of that Agency."

TABLE OF CONTENTS

Page

LIST OF TABLES . . . iii

LIST OF FIGURES . . . iv

SECTION

1 Introduction to the Area . . . 1
  Local Education Agencies . . . 2
  State Education Agency . . . 3

2 The Midland Regional Education Agency . . . 4
  Demographics of the Heartland REA . . . 4
  Governance and Administration . . . 6
  Organization . . . 11
    Media Services Division . . . 11
      Educational Services Division . . . 13

3 Midland REA Special Education Division . . . 18
  Special Education Support Services . . . 18
  Special Education Instructional Programs . . . 20
  Preschool Programs . . . 23

4 Midland REA Expenditures . . . 25

5 Evolution of Regional Education Agencies and Special Education Services . . . 26
  The County Superintendency . . . 26
  School District Consolidation . . . 26
  Area Schools . . . 28
  Joint County School Systems . . . 29
  Emergence of the REA Concept . . . 32
  Evolution of the Heartland REA . . . 34

6 Funding Regional Education Agencies . . . 36
  The Foundation Plan . . . 36
  Funding Media, Educational and Support Services . . . 38
  Funding REA and LEA Special Education Instructional Programs . . . 41
  REA Revenues and Expenditures . . . 46

7 Authority and Responsibility for Special Education . . . 48
  P.L. 94-142 and Chapter 300 . . . 48
  Authority and Responsibility . . . 48
  Heartland Special Education Policy . . . 49

8 Identifying and Placing Students . . . 50
  Processing Students . . . 50
  Program and Placement Decisions . . . 55
  The Individualized Education Plan . . . 57

9 Midland Special Education Instructional Programs 61
Instructional Options for Students 61
Program Options for Local Districts 62
Options for Parochial Schools 63
Home-LEA Special Education Programs 64
Inter-LEA Special Education Programs 65
The Largest LEA 72
Effects of Instructional Program Manipulations . . . 73
The Host LEA 74

10 Midland Special Education Support Services 76
Special Education Consultants 76
School Psychologists 79
School Social Workers 80
Speech/Language Clinicians 82
Audiology Services 83
Physical and Occupational Therapy 83
Special Education Nurses 84

11 Preschool Programs and Services 86
Home Intervention 86
Parent/Infant Teams 87
Parent Classes 87
Developmental Learning Centers 88
Toy Lending Library 88
Parent Education Materials 89
Hearing/Speech Services 89
Parent Support Group and Services 89
Parent Participation 90
Impact of the Preschool Program 91

12 Midland Vocational Education Programs 93

13 REA Responsibility for District Reorganization 95

14 Some Issue of Particular Concern to the REA 96
Public Law 94-142 96
Paperwork 98
LEA Programs for Mildly Handicapped Students 98
Teacher Preservice and Inservice Education 101
Declining Enrollments 104
Determining Appropriate Placement for Mildly Handicapped Students 104
The Largest Midland LEA 107
Finding and Keeping Quality Personnel 108
Special Education Funding 110
Equity of Instructional and Support Services 114
Transportation to Programs 115

15 What Can Be Learned From the Case 117

LIST OF TABLES

Table		Page
1	Midland Area Local Education Agencies	3b
2	Midland Area Parochial Schools	3b
3	Number of Handicapped Students Per LEA	3c
4	Educational Reorganization and Development of Special Education	30a
5	Placement Options, Weights, and Maximum Class Size	42a
6	Percent of Regular Program Costs Returned by Placement Type	43a
7	Regular Program Flow Back Funds by Weights	43b
8	Comparison of 1975-76 and 1980-81 Instructional Costs Per Pupil	44a
9	Midland Area Special Education Instructional Dollars Generated 1981-82	47a
10	Five Basic Instructional Program Options	62a
11	Special Education Programs Offered in Midland's Smaller Districts	64b
12	LEA Instructional Programs/LEA Instructional Programs	65a
13	Midland Special Education Balance of Funds	74a

LIST OF FIGURES

Figure		Page
1	Midland REA Catchment Area	2a
2	Iowa Department of Public Instruction Table of Organization	3d
3	REA Organizational Chart	6a
4	Midland REA Organizational Structure and Services	11a
5	Special Education Division Organization and Services	18a
6	Midland REA Expenditures 1981-82	25a
7	Midland REA Categories of Expenditures	25b
8	Tri-County and Richland Arrangements	34a
9	Foundation Plan	36a
10	Revenues by Sources/Expenditures by Program Costs	46a
11	Flow Chart for Referral and Special Education Services	50a
12	Locations of Midland REA Instructional Programs	62b
13	Distribution of Midland LEA Instructional Programs	63a
14	Flow of Students to Instructional Programs	64a

INTRODUCTION TO THE AREA

The focus of our story is an eight-county area located near the center of an agricultural state. Driving through the area gives no indication that these are hard times. The farms are well-kept and lush; the image is one of experimental farms, each trying to out-produce the others. Ironically, the better things look in the fields, the worse they are at the marketplace.

Corn and bean production are again likely to break all previous records. But prices are down, the credit crunch is on, and the newest federal program to remove land from production has not been viewed locally as a workable solution. Objections pour from local diners like coffee from the Proctor Silex. The plan is just too little, too late. It won't solve local problems.

Economic problems for farmers signal hard times for virtually everyone. The agribusiness support industries--farm implement and supply, meat packing, storage, transportation--are particularly hard-pressed. Although unemployment in the area is less than the national average, plant closings in some counties have caused sharp increases in the jobless rate. It has not been a good year for the local economy, and the prospects for next year are not much brighter.

Business and politics aside, the colors are green and black and white and blue--green fields, black soil, well-kept white houses and outbuildings, all spread over gentle hills against a backdrop of blue sky. There are other colors, too. They give life to the scene and remind us that these crops did not grow by themselves. The fields come to life as farmers and their families literally dig in to get the job done. The tools of the trade, two-tone tractors and the implements they pull, wait quietly to be called into action while a rainbow of pickup trucks wave as they pass one another on the two-lane. These are the same trucks that one sees in the city, but somehow they look more accustomed to work out here.

Most of this effort goes to support the livestock, which are the real consumers here. They will get most of the crop. More than three-fourths of the food eaten by the people of this state is imported from other states; humans are one step further along the food chain.

Welcome to the midwest, America's heartland. Terms like "midwest" and "heartland" convey more than locale or geography or how people make their living. There is something much bigger at work here--a spirit, an ethic, a common set of values. One need not even leave one's car to sense these things. The roads, the reststops, the layout and repair of the farms--all these things suggest a proud people, a proud state. They are proud of their land, how it is kept, what it produces. They are proud of their ethics, what they accept as values to live by, how those values are lived out from day to day. And not the least of their pride centers on their schools. It is not uncommon in rural communities for the school to serve as the focal point for community activity, spirit, and pride. And while some local observers believe that the sports program rather than the academic program is the real rallying point, particularly in the smaller communities, the value placed on education and the quality of the school system is readily apparent.

It's hard to tell which came first: pride in the school system or good schools. One thing is certain, however; the schools in this state are among the best in the country. State slogans and catch-phrases sing the praises of the school system. "Good schools for a good tomorrow" and "Our schools come first" are more than catchy slogans; one tends to believe them. If the proof is really "in the pudding," state-wide achievement scores are enough to convert even the most skeptical. Comparative studies of student achievement indicate that students in this state typically perform about a year above the average student in the nation. These same students rank first in mathematics and in the top five in verbal skills compared to other students across the country, and they rank first when compared to the other states in this region.

But what brings us to this particular area? Why these eight counties? How are they related? We are here to see how special education services are delivered through the efforts of the local school districts and the Midland Regional Education Agency (REA). The Midland REA is one of 15 such agencies created by the state to assist local school districts provide special education and a number of other educational services. Each REA serves a specific geographical area and provides its services to the local school districts which are included in it. Much more will be said about the nature and operation of the Midland REA as our story progresses. For now, however, we would like to say more about the local school districts which make up the Midland catchment area, followed by a look at state level organization.

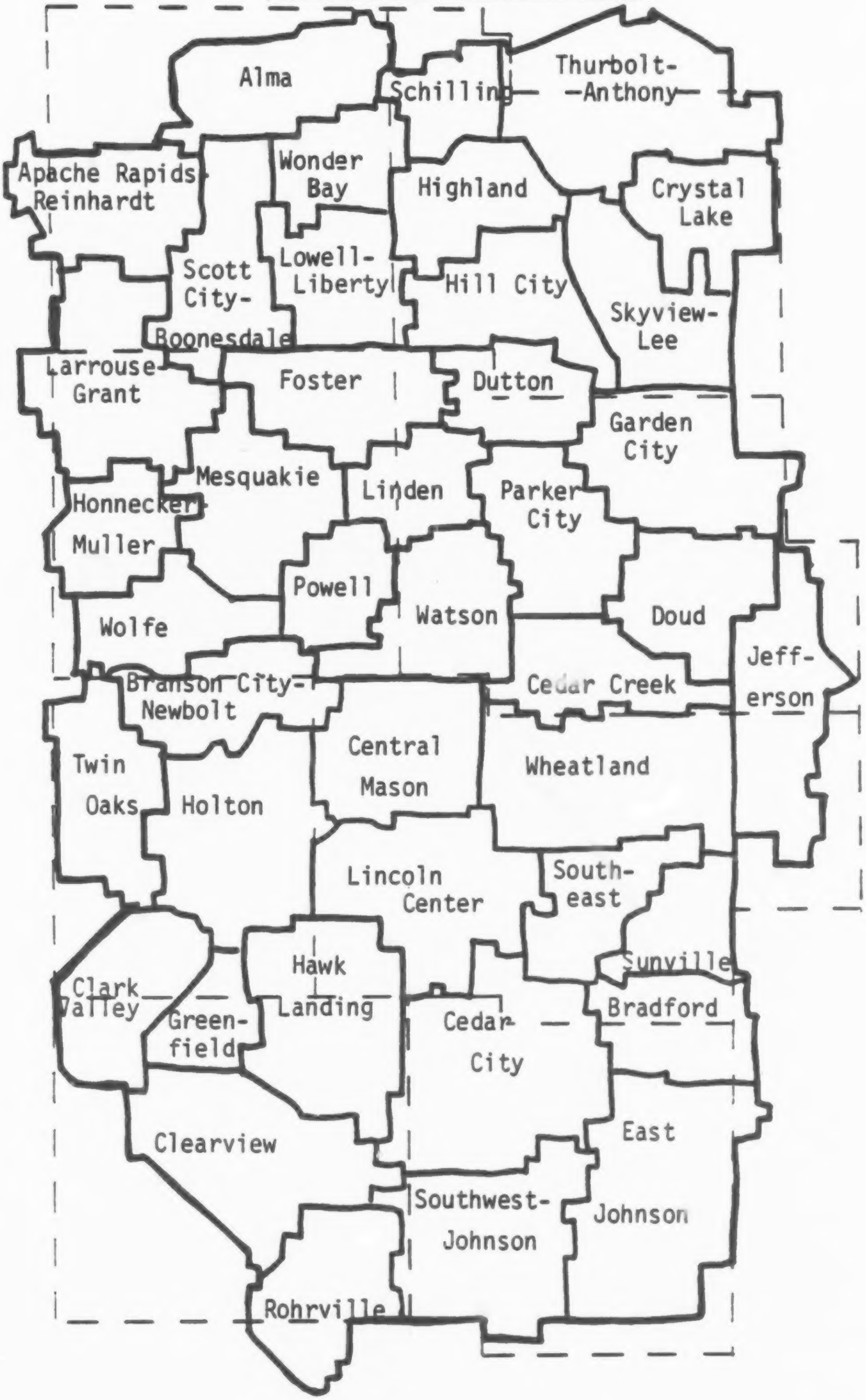
Local Education Agencies

The eight-county Midland area covers more than 5,000 square miles and includes 42 local education agencies (LEAs) serving about 30,000 students in grades kindergarten through twelve. Given these statistics, the Midland REA ranks second among the 15 REAs in terms of both number of member districts and square miles covered. However, it ranks only eighth in terms of total number of students served. Student density is 6 students per square mile, rather less than the state average of 11. Thus, the Midland REA ranks second lowest (tied with two other REAs) of the 15 REAs in terms of student density. Figure 1 shows the distribution of the 42 LEAs within the Midland area.

In addition to the 42 public LEAs, the Midland REA also serves 14 parochial schools within the eight-county region. For the most part, these are Catholic schools, but there is one Lutheran parish school and one version of the Christian schools that have recently begun to appear around the state. Parochial schools have a long tradition in this state, and the Catholic schools in this region are considered to be among the finest. The legislation creating the REAs included parochial schools as part of the service area from the start. Although the concept of separation of church and state is still as strong as it ever was, means have been devised for cooperation in the education of handicapped children.

Figure 1

Midland REA Catchment Area


Alma
Schilling
Thurbolt-Anthony
Apache Rapids-Reinhardt
Wonder Bay
Highland
Crystal Lake
Scott City-Boonesdale
Lowell-Liberty
Hill City
Skyview-Lee
Larrouse-Grant
Foster
Dutton
Garden City
Mesquakie
Linden
Parker City
Honnecker-Muller
Powell
Watson
Doud
Wolfe
Jefferson
Branson City-Newbolt
Cedar Creek
Twin Oaks
Holton
Central Mason
Wheatland
Lincoln Center
Southeast
Sunville
Clark Valley
Greenfield
Hawk Landing
Cedar City
Bradford
Clearview
East Johnson
Southwest-Johnson
Rohrville

—— Indicates School District Boundaries

– – Indicates County Boundaries

The relevant demographic data for each of the 42 public school systems are shown in Table 1. Although the districts themselves are not unusual for a rural setting, several interesting features can be identified. Eleven of the 42 LEAs serve fewer than 300 students. All but one of these LEAs have at least 2 schools, and the average attendance for each school in the 11 LEAs is 117. The next set of 17 LEAs range in attendance from 300-600 students, with an average attendance per school of 182. The next 7 LEAs range in size of daily attendance from about 600 to 800 and average fewer than 300 students per school. Finally, in the last 6 LEAs located in the larger towns within the Midland area, average attendance per school is 329.

School organization differs in each LEA according to local tradition and custom. However, a trend toward middle schools is evident in the larger districts. Although not required by the state, all Midland LEAs offer kindergarten programs. Perhaps the most interesting organizational characteristic is that all 42 LEAs maintain 12 grades. As we shall see in the section, "Evolution of Regional Education Agencies and Special Education," the 12-graded school district is a remnant of past efforts to consolidate schools.

Table 2 provides similar demographic data for the 14 parochial schools in the Midland catchment area. Only the largest towns can maintain 12 grades and only the Catholic schools of the largest town can offer a middle school/junior high program, the result of consolidating several parish schools. Table 3 gives the number of handicapped youngsters identified in each LEA and the percent of their total school enrollment so identified.

State Education Agency

The Department of Public Instruction (DPI) is organized into five branches which subsume 37 various divisions and sections. Each of the five branches is administered by an associate superintendent who passes specific authority and responsibility to the directors of his or her respective divisions, who further delegate to section chiefs. All in all, not an unusual arrangement, other than its simplicity. Figure 2 depicts the DPI table of organization. As our story unfolds, references will be made to state level organization. Although most of those references will be to the Pupil Personnel Services Branch, which subsumes the Special Education Division, at times reference will be made to other units in terms of their relationship to special education services.

Table 1

Midland Area Local Education Agencies

School Districts	Organization	Number of Schools	Enrollment
Powell Consolidated	K-8-4	2	175
Greenfield	K-6-6	2	180
Dutton	K-5-7	2	210
Foster	K-5-7	2	222
Clark Valley	K-6-6	2	225
Honnecker-Muller	K-12	1	225
Doud	K-5-3-4	3	225
Highland	K-6-6	2	250
Bradford	K-6-6	2	250
Sunville	K-8-4	2	275
Schilling	K-6-6	2	282
Rohrville	K-6-6	2	300
Cedar Creek	K-4-4-4	3	311
Lowell-Liberty	K-6-6	2	335
Wolfe	K-6-6	2	335
Crystal Lake	K-6-6	2	335
Branson City-Newbolt	K-6-6	2	350
Linden	K-6-6	2	358
Northeast Mason	K-5-3-4	3	365
Central Mason	K-6-6	2	366
Apache Rapids-Reinhardt	K-6-6	2	372
Twin Oaks	K-6-6	2	373
Southwest Johnson	K-4-8	2	380
Scott City-Boonesdale	K-6-6	2	400
Skyview-Lee	K-6-6	3	470
Larrouse-Grant	K-5-3-4	3	530
Thurbolt-Anthony	K-5-3-4	3	580
Garden City	K-6-6	2	590
Alma	K-6-6	2	600
Parker City	K-6-2-4	3	610
Watson	K-6-6	2	620
Mesquakie	K-6-6	2	635
Hill City	K-6-2-4	3	730
East Johnson	K-6-6	2	750
Clearview	K-6-3-3	3	773
Wheatland	K-6-6	2	800
Hawk Landing	K-4-4-4	4	1,298
Rutherford	K-4-2-3-3	4	1,344
Holton	K-6-3-3	4	1,460
Wonder Bay	K-6-2-4	6	1,609
Cedar City	K-6-3-3	9	2,150
Lincoln Center	K-6-3-3	14	5,643
		121	28,291

BEST COPY AVAILABLE

Table 2

Midland Area Parochial Schools

City	School	Organization	Number of Schools	Enrollment
Victoria	St. Mary's	1-8	1	60
Red Cloud	Sacred Heart	K-8	1	70
Mesquakie	Mesquakie Catholic	1-6	1	90
Foster	Lady of Faith	1-8	1	100
Cedar City	St. Thomas Aquinas	1-6	1	110
Lincoln Center	Christian School	K-10	1	118
Holton	St. Paul's	1-8	1	127
Lincoln Center	St. John's Lutheran	K-8	1	132
Wonder Bay	St. Matthew's	K-8-4	2	365
Lincoln Center	Consolidated Catholic	K-6-2-4	4	1,180
			14	2,357

Table 3

Number of Handicapped Students per LEA

School Districts	Enrollment	Handicapped Students	Percent of Enrollment
Powell Consolidated	175	19	10.9
Greenfield	180	13	7.2
Dutton	210	2	.1
Foster	222	24	10.8
Clark Valley	225	18	8.0
Honnecker-Muller	225	20	8.9
Doud	225	22	9.8
Highland	250	16	6.4
Bradford	250	15	6.0
Sunville	275	3	1.1
Schilling	282	24	8.5
Rohrville	300	22	7.3
Cedar Creek	311	32	10.3
Lowell-Liberty	335	39	11.6
Wolfe	335	22	6.6
Crystal Lake	335	32	9.6
Branson City-Newbolt	350	38	10.9
Linden	358	17	4.7
Northeast Mason	365	38	10.4
Central Mason	366	20	5.5
Apache Rapids-Reinhardt	372	33	8.9
Twin Oaks	373	37	9.9
Southwest Johnson	380	30	7.9
Scott City-Boonesdale	400	32	8.0
Skyview-Lee	470	56	11.9
Larrouse-Grant	530	43	8.1
Thurbolt-Anthony	580	37	6.4
Garden City	590	42	7.1
Alma	600	45	7.5
Parker City	610	34	5.6
Watson	620	38	6.1
Mesquakie	635	50	7.9
Hill City	730	51	7.0
East Johnson	750	58	7.8
Clearview	773	64	8.3
Wheatland	800	35	4.4
Hawk Landing	1,298	107	8.2
Rutherford	1,344	97	7.2
Holton	1,460	100	6.8
Wonder Bay	1,609	138	8.6
Cedar City	2,150	179	8.3
Lincoln Center	5,643	558	9.9
	28,291	2,300	8.1

BEST COPY AVAILABLE

THE MIDLAND REGIONAL EDUCATION AGENCY

The REAs were established by the state legislature in 1974 to provide "an effective, efficient, and economical means" of identifying and serving children from birth to age 21 "who require special education" and "to provide for media services and other programs and services for pupils in grades kindergarten through 12 and children requiring special education." REAs also were authorized to provide other education services, within the limits of available resources, at the request of the local school boards in their assigned region.

From this original intent, several refinements have evolved in practice or through specific legislative action. Under the authorization alluded to above as "other education services," all 15 REAs currently maintain three divisions: Special Education, Media Services, and Educational Services, the latter division encompassing these "other" services.

Other refinements have resulted from specific legislative actions, which have extended the responsiblities of the REAs in two respects. First, in 1978, the REAs were assigned additional responsibilities for school district reorganization within their region (see later section: "Governance and Administration of the REA"). The second statutory refinement occurred in 1980 and authorized REAs to provide assistance to LEAs in identifying children and establishing programs for talented and gifted students. This service has been incorporated into the services offered via the Educational Services Division within each REA. Further, the REAs conduct surveys and carry out other assignments as directed by the state. In many ways, the REAs provide "a regional link" between the DPI and the local districts.

Demographics of the Heartland REA

We have already noted the physical characteristics of the Midland service area: 5,000 square miles, 45 local school districts, 14 parochial schools, 127 public school buildings, 31,766 students. This section describes the REA itself, its personnel and facilities, and how it operates to carry out its responsibilities in the Midland area.

Legally, the REA is a school corporation. As such, it may hold property and execute lease-purchase agreements. In virtually all respects, it operates as a school district. It maintains a board of directors and employs administrators and other personnel to carry out its assigned responsibilities. The Midland REA employs 266 full-time professional, paraprofessionals, and classified staff. Of the total, 214 staff members, 141 professional certified staff and 73 clerical staff and aides work in the special education division.

Facilities

The main REA facility in Lincoln Center is not very impressive when viewed from the outside. For the most part, it looks like a simple one-story brick building, with a portion of it extending the structure to two stories. What is impressive, however, is the interior and what goes on there.

Perhaps because the building was formerly a medical arts facility, the interior immediately impresses one with its professional atmosphere. The agency receptionist sits behind the information counter waiting to direct clients to their destinations. Two stairways off the main lobby reveal that, in addition to a partial second story, there is another entire floor underground. The building takes on larger proportions from an inside perspective.

The former purpose of the building fits well with its current uses. Examination rooms become testing rooms; waiting rooms and vestibules become reception and clerical work areas; doctors' offices become staff offices; and nameplaque holders now read like an educational directory rather than a medical one.

One should not interpret "professional" as "cold," however. One soon realizes that the professional atmosphere resembles the former medical building atmosphere only in that it sends a clear message that serious work goes on here. Beyond that, the resemblance fades. There are no somber waiting rooms; rather, clients, parents for the most part, can be seen talking in groups among themselves, or talking with REA staff. The parents typically have very young handicapped children and are here to deliver them for their weekly sessions with REA special education staff, as well as to meet with each other while their children are in therapy sessions.

As spacious as the facility is, an immediate impression is that "you can't fit 266 people in here." In fact, only about 80 of the staff members are located at the Lincoln Center facility; the remaining staff are housed in several other facilities spread throughout the service area.

In addition to various REA classroom facilities, special education "satellite offices," as they are called, are located in the county seats of seven of the eight counties. The main facility serves as the REA office in the eighth county. The satellite office arrangement is used to reduce traveling, to make the REA as visible as possible in the area communities, and to facilitate the perception of the REA as a part of the local public schools. Moreover, the satellite offices "act as a buffer for immediate problems."

Each satellite office has an office manager and a secretary. The offices exist to facilitate the delivery of special education services, each office housing the special education support staff assigned to that particular area. The office manager (typically a special education consultant, psychologist, or speech/language clinician) is just that--a manager. He or she supervises the office and secretary but does not ordinarily have supervisory responsibility over the other professional staff housed there. Of the 141 certified special education staff members, 100 operate out of the satellite offices.

The production facilities and administrative offices for the media division are located at the North Midland Community College (NMCC) here in Lincoln Center. In addition to the satellite offices and media facilities, the REA operates a number of special education instructional and diagnostic units within the eight-county area, which house special education programs and staff. These generally are located in churches, schools, and store fronts, which, for the most part, are leased. And, as one might expect, the REA operates special education classrooms in various facilities including some of the schools of the LEAs that make up the Midland catchment area.

So, while the special education division is decentralized in various locations around the Midland area, the media division operates totally out of facilities at the community college, and the educational services division houses its staff and operates out of the central office in Lincoln Center.

Governance and Administration of the REA

The state statute creating the REAs delineates the duties, authorizations, and operations of the board of directors, the governance mechanism of the REAs. Policies are developed by the board in response to state and federal mandates as well as requests by member districts and carried out by action of the board through the REA chief administrator. Figure 3 depicts the flow of authority from the State Board of Public Instruction.

Governance

Most REA services result from federal or state mandate or from needs expressed by local districts. How these services are delivered and paid for, however, is the responsibility of the Heartland REA Board of Directors. Each board member (director) is elected to the position by the school boards of the 42 LEAs within the Midland area. Nine directors each serve staggered, three-year terms without pay.

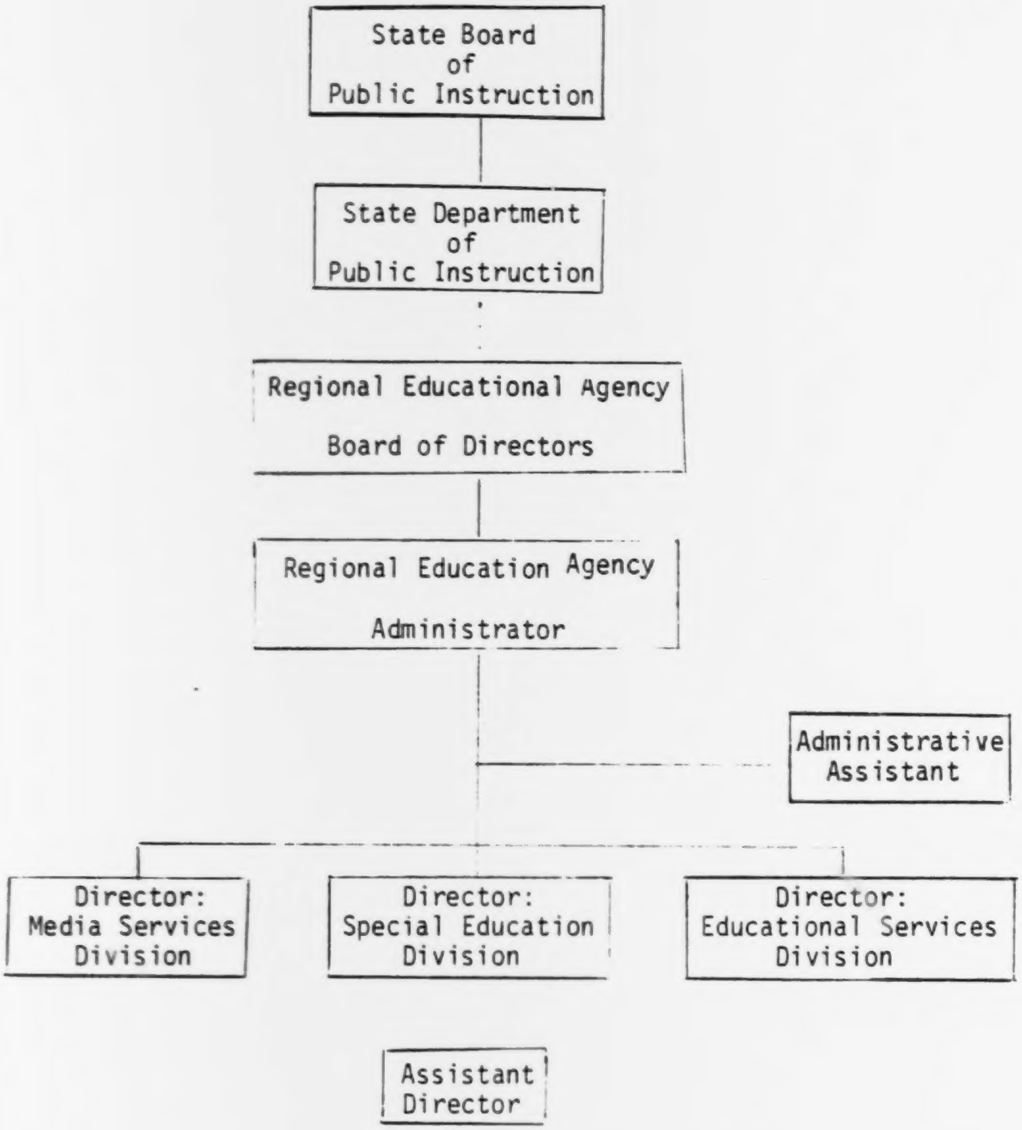
Each director represents one of nine "Director Districts" within the Midland area which have been determined on the basis of population. Directors must reside in the Director District they represent and may be a member of a school board within that district, but they may not be an employee of an LEA (one of the current Midland directors is also a local school board member). Once the board has been formed, the directors elect a president and vice-president and appoint a treasurer and secretary. The REA chief administrator serves the board as its chief executive officer.

The makeup of the Midland Board of Directors is not what one might expect in a rural area. Attending a Board meeting would lead one to believe that he had been transported somehow to the corporate board room of a major company; these people mean business. Motions from the floor, seconds, debates, votes--all in all, an impressive array of talent assembled to govern the Midland REA.

Board members tend to be local business people and professionals; the current board includes one Ph.D., one veterinarian, and one engineer, in addition to a contractor and other small business owners, including a farmer. Although the directors rely on the chief administrator's expertise relative to educational concerns, there is certainly no lack of expertise

Figure 3

REA Organizational Chart


State Board of Public Instruction
State Department of Public Instruction
Regional Educational Agency Board of Directors
Regional Education Agency Administrator
Administrative Assistant
Director: Media Services Division
Director: Special Education Division
Director: Educational Services Division
Assistant Director

to deal with fiscal and management matters. And serving on the board is not simply a matter of attending the monthly meetings and voting "aye" or "nay". Directors work between formal meetings. Often they must review materials prepared by the chief administrator to inform them of the substance of the issues they will consider at the next meeting. At times, there is committee work between meetings and away from the REA.

The Midland Board of Directors is responsible for establishing educational policies and administrative procedures that support and supplement rules and regulations promulgated by the DPI. Program and service plans, as well as the annual budget, are approved by the board and then submitted to the State Board of Education for final approval. The board also is authorized to enter into contracts or agreements with other agencies for programs, services, and/or facilities. The board appoints advisory committees from the local districts and establishes evaluation procedures for the Midland REA programs and staff.

Administration

In addition to the Chief Administrator and the three division directors, two other positions round out the Midland REA administrative structure: an administrative assistant to the chief administrator who also serves as the REA business manager, and an assistant director who serves under the Director of Special Education. Administratively, both the Directors of the Media Services and Educational Services Divisions serve unassisted. Given the size of the REA, in terms of personnel, budget, programs, and land area, six administrators hardly seems excessive.

Central Administration. The chief administrator, his administrative assistant, and a small support staff, including a three-person bookkeeping department, make up the central administrative staff. The statute creating the REAs defines the responsibilities of the chief administrator as follows:

1. cooperate with boards of directors of local school districts of the regional education agency in considering and developing plans for the improvement of the educational programs and services in the regional education agency.

2. when requested, provide such other assistance as possible to school districts of the regional education agency for the general improvement of their educational programs and operations.

3. submit program plans each year to the department of public instruction to reflect the needs of the regional education agency for media services.

Immediately evident is the fact that the chief administrator has no real power over the LEAs. This is by design; the REA is a service agency. Consistent with this service role, the chief administrator is required to cooperate with local districts to improve REA services, provide services at the request of local districts, and to devise service plans which respond to the media needs of local districts. Noticeably absent in the list of duties is any responsibility for special education services. But how can this be since we know that this is the REA's primary purpose? The responsibility for special education services rests with the director of special education. This, in itself, is a very interesting administrative arrangement, but as will be seen in the next section, it becomes even more interesting when one understands the reasoning and politics behind it.

Even with this administrative quirk, let there be no doubt that the chief administrator is in charge. As in any other administrative hierarchy, the three directors--Special Education, Media, and Educational Services--report directly to the chief administrator. In addition to the perfunctory duties associated with the overall administration of the REA, the chief administrator and his central administration staff have a number of additional ongoing responsibilities.

The primary responsibility is the management of the REA budgets, a very complex matter. In addition to keeping separate accounts for the three divisions, the REA manages an array of budgetary matters for its member LEAs. The REA business office handles tuition statements for LEAs which have asked the REA to operate certain special education programs (explained later in the section "REA Funding: Revenues"), bills for media production, purchase orders for the cooperative buying service offered by the Educational Services Division, checks from school districts for workshop registrations, and a host of other fiscal matters that keep the three bookkeepers busy. Although the REA purchases computerized bookkeeping services from a private accounting firm, the front-end work necessary to keep the computer happy is formidable.

Another major responsibility of central administration is the processing of school district reorganization proposals. This responsibility is time-consuming, expensive, and, to a certain degree, controversial. In order to understand the issues, one needs to know the history of school consolidation in this state. This history and the REAs' part in it will be discussed later in the section "Evolution of Regional Education Agencies and Special Education Services." For now, it is safe to say that the REA would rather not have anything to do with school reorganization.

Perhaps the most important role of a chief administrator is that of maintaining good relations with the superintendents of the LEAs. From their vantage point, the view at the state level is that the "personal trust" built between a chief administrator and superintendents is what makes the REAs work. And if maintaining good relations with superintendents is the essential skill, the Midland's chief administrator has all the necessary credentials. Prior to joining the REA, he had been a principal and/or superintendent in several LEAs in the Midland area. He knows the schools, the area, and the people. His credibility with local superintendents is enhanced because he has "been there," so to speak. He is one of their own, selected from their ranks.

Because the REA's primary purpose is to provide special education services, it is important for a chief administrator to understand the goals, services, and operations of special education programming. Here, too, the Midland chief administrator has the necessary experience. In his last two positions prior to joining the REA, he served as superintendent in two districts that had evolved into special education centers prior to the formation of the REA. Thus, the credentials of the chief administrator appear to be totally in line with the demands of his job.

Director of Special Education. The REA legislation gave the director of special education in each agency the "responsibility for implementation of state regulations and guidelines relating to special education programs and services," with the following "powers and duties."

1. Properly identify children requiring special education.

2. Insure that each child requiring special education in the area receives an appropriate special education program or service.

3. Assign appropriate weights[1] for each child requiring special education programs or services.

4. Supervise special education support personnel.

5. Provide each school district within the area served and the department of public instruction with a special education weighted enrollment count twice annually.

6. Submit to the department of public instruction special education instructional and support program plans and applications including those for new or expanded programs and services.

7. Coordinate the special education program within the area served. Include in the program plans submitted to the department for support services the cost necessary to fund identified nonpublic school pupils served by the area with support services.

One immediately notes the difference in the language between the role of director of special education and the role of chief administrator. The chief administrator is assigned "duties," whereas the director of special education is assigned "powers and duties." Comparing the two indicates that, although the chief administrator has no real power over the LEAs, the director of special education clearly does; indeed, some regard his authority as "awesome." The state views each REA as a single special education program for which the REA director of special education has full responsibility. As such, the director has "maximum power" over the LEAs with respect to the education of handicapped youngsters.

---

[1] The weighting of handicapped students will be described in the section "REA Funding: Revenues."

As one might expect, power translates into money. As the coordinator of the special education program in the Midland area, the director properly identifies children requiring special education (has the final word on who is and is not handicapped), insures that each identified child receives an appropriate program (has the final word on what is or is not an appropriate program for any given youngster), and assigns appropriate "weights" for each child (has the final word on the level of service required and thus determines the money the LEA will receive to educate the child properly). These powers give the director the final authority regarding the appropriateness of special education programming for all handicapped children in the Midland service area.

The significance of the powers of the director of special education cannot be overemphasized; they will come into play at various points throughout this case study. For now it is important to know that they exist; later it will be important to see how they are used.

Why were directors of special education given these powers? Why not bestow them on the chief administrator to be delegated to the director of special education? The answer, although perhaps not immediately apparent, is very logical, and reflects the thinking of individuals astute in public school politics.

One should recall that the REAs are service agencies, and that making them work requires a chief administrator who can maintain good relations with local superintendents. Maintaining these relationships requires that the chief administrator be accepted by superintendents as one of their own, someone from their own ranks. Good relations are much easier to maintain when one serves another than when one has power over another. If the chief administrator had to maintain good relations (necessary to the survival of the REA) while simultaneously implementing the state special education mandate, he or she would undoubtedly be faced with making compromises.

Thus, we see that administratively the operation of the REA and its special education program require an educational version of the "good cop/bad cop" strategy. The director of special education can take the heat from disgruntled superintendents; he has the power. The chief administrator can maintain good relations with the superintendents; he's one of them; he understands; and, moreover, it's out of his hands--everyone knows that it is the director of special education who has the power.

One should not assume, however, that the director's power is the answer to all potential difficulties between the REA and the LEAs with regard to special education. An important function of the chief administrator is to "smooth out" disagreements when they occur. Three potential situations arise when the director interacts with districts in matters related to special education. The most positive outcome is when the district, the parents, and the director are in agreement regarding the identification and/or placement of a handicapped student. Problems arise when the district and director agree and the parents disagree or when the director and parents disagree with the district. The former case, which of the two cases happens most often, does not present an

LEA-REA relation problem. These situations are handled in various formal and informal ways, which will be explained later in the case study. The latter situation, however, creates a problem for the director and the chief administrator. It is in these cases that the chief administrator's credibility as a former area superintendent and building administrator come into play. His job is to try to mend fences, smooth things out, maintain good relations. Luckily, this latter situation happens infrequently. And although it happens infrequently, it is not for a lack of potentially troublesome situations. Whenever the director of special education sides with parents over the LEA, the situation is created for what sometimes develops into a heated disagreement.

Can the Midland Director of Special Education take the heat? Of course he can, although his personal style of administration as well as his professional background interact to cool things substantially. How he administers the special education program (read, uses his power) will be addressed at numerous points throughout the rest of this case study. Indeed, the director's administrative style is a key element of the Midland special education program.

Prior to joining the Midland REA as its first director of special education, he was director of special education for a three-county cooperative venture. All three counties are currently within the Midland service area, and, in fact, the home base for the arrangement was located in Lincoln Center, the home of the REA. In many respects, the current Midland special education program was a natural evolution from the old Tri-County Special Education Cooperative, as it was called.

His job then was very similar to his current one. He coordinated special education services on a regional basis, working with multiple LEAs. The primary difference between the Tri-County arrangement and the Heartland program is that, at the time of his work for Tri-County (1968-1975), special education programming was "permissive" and not mandatory. As such, the development of new programs and the expansion of established ones required "finesse" rather than power.

Organization

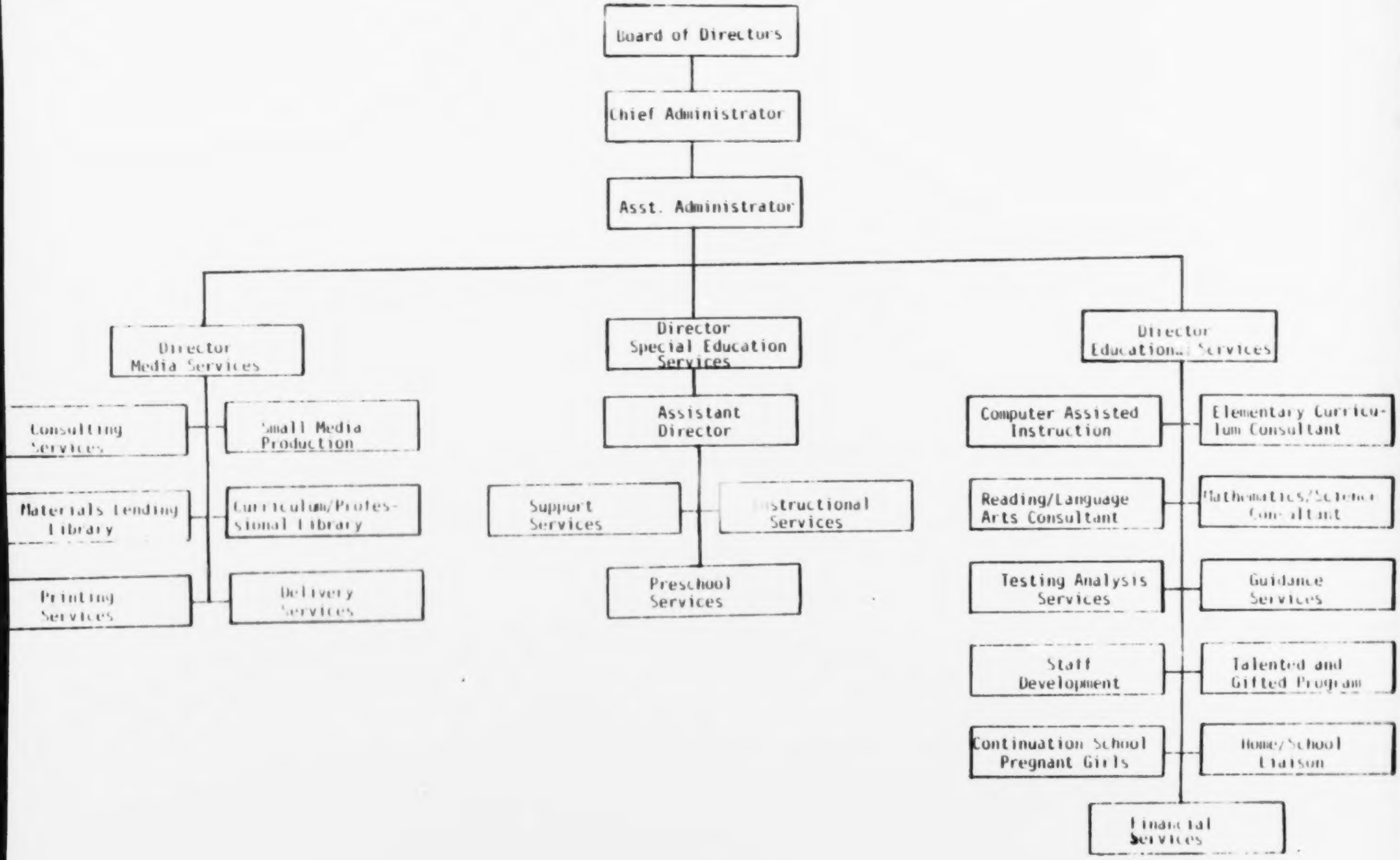
As we have noted in previous sections, the Midand REA, like the other REAs, provides three primary areas of services: special education, media services, and educational services. All three types of services are provided for students who attend school in the 42 LEAs and 14 parochial schools. Special education is by far the largest division, employing nearly 80 percent of the Midland staff. Figure 4 illustrates the organizational structure of the REA and identifies the various services provided by each division.

Media Services Division

The provision of media services was a priority in the state before the inception of the REAs. A former state superintendent, the main force behind the development of media services, used ESEA monies to develop a system that predated the REAs but did use an area concept. Media services were then incorporated into the REAs in the original

Figure 4

Midland REA Organizational Structure and Services


Board of Directors
Chief Administrator
Asst. Administrator
Director Media Services
Director Special Education Services
Director Educational Services
Consulting Services
Small Media Production
Materials Lending Library
Curriculum/Professional Library
Printing Services
Delivery Services
Assistant Director
Support Services
Instructional Services
Preschool Services
Computer Assisted Instruction
Elementary Curriculum Consultant
Reading/Language Arts Consultant
Mathematics/Science Consultant
Testing Analysis Services
Guidance Services
Staff Development
Talented and Gifted Program
Continuation School Pregnant Girls
Home/School Liaison
Financial Services

BEST COPY AVAILABLE

legislation which called for the creation of "media centers" within each REA. The Midland REA chose the name "Learning Resource Center" (LRC) for its facility, a term which more accurately describes its holdings and functions.

As we have noted, the LRC is not located at the main REA facility, but at the Midland Community College (MCC) in Lincoln Center. The college serves 2700 students in 25 postsecondary programs and provides spacious facilities for all aspects of the LRC operation for a startlingly low fee--$600 per month. In return, the LRC provides media production for the NCCC's 25 postsecondary programs (2700 students). This is only one example of the many collaborative arrangements between the Midland REA and the MCC.

It's easy to see why the Media Services Division is well thought of by the LEAs. Media are visible and tangible; in many ways, its media services are the REA's best public relations tool. This doesn't mean, however, that there are not those who see media services as a frill that can be cut when money is a problem. Nor does it mean that each consumer understands and can capitalize upon the potential of today's media capabilities. Sadly, some continue to view media as the equipment used to experience them.

The Media Services Division is administered by the director who coordinates the activities of 4 professional staff members, 13 classified production/service staff members (artists, printers, etc.), and 4 classified clerical staff. Six services are provided.

Materials Lending Library. Through the lending library, the Midland LEAs have access to 6,500 films, 20,000 books, and more than 2,000 multi-media kits. The LRC's films had a circulation of over 55,000 this year. Circulation rates increase each year. Book circulation is currently over 70,000. All loan material is scheduled using a computerized "booking" procedure. The materials lending library is the LRC's most popular service.

Curriculum and Professional Library. As the name suggests, this service provides learning and reference materials for students and teachers, including materials for problem learners. The curriculum laboratory is maintained by a librarian who works with the Educational Services Division curriculum consultant and each subject area consultant to maintain the currency of the collection. The professional library includes a computerized reference system in which all current research in education can be called up for teachers and administrators.

The professional library is the Media Division's least used service. There's no apparent reason for this except that, like most teachers, the Heartland teachers find barely enough time to keep current with their students' needs, let alone with the newest developments in the professional literature.

Delivery Services. Naturally, getting the materials to the consumers in a 5,000 square mile area is the key to a successful lending library service. The LRC's four delivery vans traveled over 80,000 miles this year, making stops twice per week at each of the 151 public and parochial schools in the service area (over 50,000 service stops). The vans will deliver professional materials, too, and carry communications among LEAs and the REA satellite offices and other facilities.

Printing Services. The LRC produces student and professional materials. Over 50 percent of the printing is for direct student use. For the most part, these materials are curriculum products of various types--manuals, answer booklets, instructional modules, and the like. Some of these materials are published by the Midland agency or by other REAs and/or the DPI.

Over 1,000 separate printing jobs were completed by the eight-person printing staff (over 5,000,000 impressions). The printing equipment is what you would find in any commercial print shop. Whether one sees the finished products or watches the staff at work, it is evident that the print services arrangement is a professional operation.

Small Media Production. The production staff duplicated and/or created nearly 3,000 jobs at the request of Midland teachers during the 1981-82 school year. Textbooks were duplicated and recorded for students with reading problems, audio (400) and video tapes (over 1,000) were duplicated for general classroom use, several slide programs and numerous overhead transparencies were produced and over 12 miles of materials were laminated. The production center is the second most used service offered by the LRC, after the materials lending library.

Consultation. In addition to providing, producing, and circulating media materials, the LRC offers consultation services to teachers and administrators as they plan for media production and use. LRC consultants and the director conduct workshops on the proper use of equipment and materials. They often use the terms "the modern student" or "today's child;" the implication being that, today, children are surrounded by media and that they have learned to expect it. The LRC wants not only to provide such material but to prepare professionals to use it appropriately.

Educational Services Division

Of the three divisions, the Educational Services Division has the least clear mandate. Whereas special education and media services are specified in the REA legislation, educational services are not; instead, they are permitted to evolve at the request of the LEAs. Because of its emergent nature, the Midland Educational Services Division has become the "utility player" within the REA; it handles service requests that do not fit neatly into the other two divisions. From a management perspective, the Educational Services Division is more difficult to operate than the other two divisions. Projections relative to staff hiring and deployment are more difficult, for example, because future needs are not as clearly known. To compensate for this uncertainty, the director fills in the gaps when new needs cannot be adequately addressed by his staff within their current assignments. When requests come in for services or programs that cannot be met by the Heartland Educational Services Division, they are contracted for with other REAs. Nearly all such contracts are arranged between the Midland REA and one of two adjacent REAs.

Division staff includes eight consultants, a continuation school teacher, and a home-school liaison worker. The staff is housed at the main REA facility in Lincoln Center, although it is safe to say that on any given day most of them are out in the schools. Eleven services or programs are currently operated by the division.

Computer Assisted Instruction. CAI is the most rapidly expanding area of service. For some time the REA offered centralized mainframe computer services with a time-sharing delivery system available to the LEAs. But by the end of the 1980-81 year, 26 of the 42 districts had purchased microcomputers, and, by the fall of 1981, 350 microcomputer software programs were available on a shared basis through the division. Work is underway to make the two systems compatible and, when completed, the combination will provide access to over 1,200 software programs. At the start of the year, all but four LEAs had access to either an Apple II, time-sharing, or both.

The CAI consultant conducts workshops for teachers and administrators on computer applications and community awareness activities through presentations to various community groups. The division, like the REA generally, does not miss an opportunity to make the community aware of its services and activities.

Testing Analysis Services. The consultant who heads this service area wears several hats. In addition to his testing services responsibilities, he handles career education and assessment, multi-cultural/non-sexist education, and serves part time as a guidance and counseling consultant. The primary testing service is called Project ASSESS (developed at another REA). Through this program, the REA analyzes achievement test scores and identifies strengths and weaknesses in the curriculum. As a follow up to the analysis, the division assists the schools in making curriculum adjustments as well as in planning instruction to meet the learning styles and levels of individual students.

Mandated by the state in 1980, multi-cultural/non-sexist education has been a recent add-on for the Educational Services Division and this consultant. Inservice programs for most of the districts and parochial schools were conducted during the 1980-81 school year, and a series of subject area workshops relative to multi-cultural/non-sexist education has been scheduled in conjunction with the DPI over the next three years.

Two separate systems facilitate career assessment/awareness: a slide-tape program which measures functional skills associated with specific career options and a computerized career information system. Guidance counselors at each school know the system and help teachers use it on request. The system is used with both regular (administered by counselors) and special (administered by work experience instructors) education students. About 1,000 students participate each year.

Guidance. The guidance consultant works with the guidance counselors in five of the nine counties (the testing consultant, as part of his guidance role, serves the counselors in the other four counties) on a half-time basis and coordinates the Educational Services Division staff development program (discussed below). As guidance consultant, he plans and conducts workshops for guidance counselors and coordinates the publication of the Counselor Newsletter which is printed at the LRC. In addition, he serves on the LRC Advisory Committee and chairs the Heartland Inservice Committee.

Staff Development. The staff development program is a separate undertaking from traditional inservice education programs. The main difference is that courses can be taken for certification renewal or graduate credit through several colleges and universities in the state (including the three largest institutions in the state as well as two smaller colleges, one located in the Midland area). In 1976, the State Board of Public Instruction amended the state code to allow recertification credits (up to one half) to be earned in an approved inservice education program. The Midland REA program was approved in 1977 and since then has offered an impressive program of courses.

Fifty-three courses will be offered for certification renewal or graduate credit this summer including several courses offered by the special education division. In general, courses include topics such as human relations, assertive discipline, beginning sign language, effective relationships with students, human growth and development, stress management, software design, non-verbal communication, counseling special students, and English as a second language. Last summer, more than 700 individuals from the Midland area took advantage of the offerings. Teachers receive the course listing by the beginning of April each year and register before school dismisses at the end of May. Although special education topics are included in the course offerings each year, the director of special education admits that the full potential of the staff development program for reaching regular teachers has not been capitalized upon.

Talented and Gifted Program. The TAG (talented and gifted) consultant provides technical assistance in identification and program development. Most districts use a resource room model and some add to that by identifying teachers who serve as "mentors" for TAG students.

The TAG consultant conducts inservice programs; serves as a board member on Midland TAG, an advocacy group comprised of parents and educators; publishes The Talented and Gifted Express, a newsletter for educators; and distributes literature to parents of TAG students to help them understand and respond to their child's giftedness.

Elementary Curriculum Assistance. The elementary curriculum consultant responds to the requests of LEAs and individual teachers for curriculum assistance. In some cases she develops materials with the assistance of the LRC; however, most requests can be handled through the LRC's curriculum laboratory, other local schools, and various consultants in the Midland agency or another REA.

Requests from district superintendents and principals usually encompass textbook selection assistance, using achievement test scores to improve instruction, evaluations of curricular packages, inservice education in specific academic areas, and preparation of courses of study and curriculum guides. Teacher requests tend to be limited to materials and, although the consultant is prepared to provide tailor-made inservice programs, requests for them come less often than she would like. She maintains relations with the administrators by holding dues-paying membership in the Midland Elementary Principals Association.

Reading/Language Arts. Although the consultant in this area has primary responsibility for reading and language arts instruction, she, like many of the other consultants, wears several hats. One major responsibility is her coordination of a tightly-structured, general reading program that the Midland agency has adopted. At the request of teachers, she helps coordinate the reading program with the basal series currently in use. Numerous workshops and inservice programs are offered on topics related to reading and language arts, as well as other topics such as death education, motivation, ego enhancement, affective education, and values/decision-making.

The consultant conducts workshops for various groups in addition to teachers and administrators, for example, the DPI, the state's public broadcasting network, and substitute teachers. She also presents programs for local community groups and publishes three reading/language newsletters, up to nine separate issues during the academic year.

Mathematics/Science. The current state of affairs in mathematics/science education in the Midland LEAs is not unlike the national scene--deficiencies in problem solving, long division, measurement, and the use of electronic aids; the consultant's goal is to convince LEAs to examine these areas.

The Educational Services Division adopted the Berkeley/Seattle Health program, and currently 25 LEAs and two parochial schools, including nearly 6,000 students in grades K-7, are using the hands-on program, which is aimed at student self-understanding. The mathematics/ science consultant coordinates the program's delivery among the participating schools, including the printing and distribution of program materials, film purchase and scheduling, and dissection specimen delivery.

Another innovative curricular program offered by the Educational Services Division is the Starlab Planetarium System. The mathematics/science consultant coordinates the scheduling of two portable planetariums into Midland schools on request. He provides the necessary materials and inservice training to enable each school to use it effectively. The planetarium is a K-12 offering that provides instruction from simple star locations to complex astronomy.

Financial Services. Although these services are certainly not as exciting as a portable planetarium, they are no less essential to effective school operations. The financial consultant provides assistance to local administrators and school boards in budgeting, fiscal accounting procedures, and preparation of annual fiscal reports to the state.

Although some of this work has been simplified through the use of the REA computers, the financial consultant's workload actually increased because he now serves as the liaison between LEAs and the Computer Center and, in addition, must conduct inservice sessions for administrators on the use of software for administrative applications.

In addition to these general fiscal services, the financial consultant is responsible for other services which are related to fiscal operations such as family census processing (required by the state), property accounting, energy audit, and cost analyses relative to contract negotiations in the districts and in the REA itself.

The financial consultant also completes the annual computer plan which requires coordinating input from all LEAs with the REA and the MCC (a cooperative arrangement for the Computer Center) and assists in the preparation of the annual REA plan. This latter endeavor requires studies of local enrollments and curriculum as well as studies undertaken relative to school district reorganization proposals which must be processed through the REA.

Continuation School. The Educational Services Division offers a continuation school program for pregnant teenagers and employs a full-time teacher to manage it. Concern for teenage pregnancy in the Heartland area predates the REA by 10 years. The school began in 1965 and was subsumed by the divison when the REA was created in 1975.

The continuation program allows and encourages pregnant girls to continue their education while providing special attention to their unique physical, social, and emotional needs during and after pregnancy. Each student takes part in accredited, independent study correspondence courses offered through a university in a neighboring state. The courses correspond to the regular high school curriculum. The girls are followed up after they leave the program and return to their home community and/or school.

Home/School Liaison. This service is limited to the Lincoln Center school district, the largest of the Midland LEAs and the location of the main REA facility. Unlike the smaller districts where home-school communication is facilitated by the size of the school population and the community, the Lincoln Center LEA's size warrants such a service.

Lincoln Center offers a Saturday program to discourage discipline problems during the week and, particularly, to reduce and make up for truancy. The district staffs the program with one of their own teachers but the home/school liaison person participates in the Saturday sessions and makes home visits when necessary. Although, in the past, the home/school liaison worked mostly with minority students and their parents, her population has expanded since her involvement with the Saturday program. In addition, in recent years, she has worked closely with the Vietnamese and Laotian students and their families who have immigrated to the area. Special programs for these students are provided in the Midland schools and coordinated through the REA.

MIDLAND REA SPECIAL EDUCATION DIVISION

The purpose of this section is to provide an overview of the services and staffing of the Special Education Division of the Midland REA. Most of this case study will be devoted to special education services and programs; this section is meant only to provide an introduction to the division so that its size and operations can be viewed in relation to the other two divisions. Later sections will detail both REA and LEA special education operations.

The special education division exists primarily to provide special education support services (school psychology, speech clinicians, school social work, occupational and physical therapy, and the like). A clear preference is voiced in the REA legislation for provision of special education instructional programs (direct instruction of children) at the LEA level. However, the REAs may provide instructional programs at the request of LEAs within their region. LEAs typically request the REA to provide instructional programs when providing their own programs is not practicable.

In addition to support services and some instructional programs, each REA offers a preschool program for children who are under the age of five[1] and who require special education. These children typically have disabilities that are more severe and thus more recognizable at an early age.

Thus, the Midland REA offers three types of programs/services: special education support services, special education instructional services, and preschool programs. The following sections briefly describe the individual services available within each of the three areas. Figure 5 depicts the organization of the Special Education Division and identifies the number of staff involved and the staffing pattern.

Special Education Support Services

Ten general types of support services are provided to each of the 42 LEAs and the parochial schools in the Midland catchment area, undergirding both the special education direct instructional programs of the LEAs and of the REA and the preschool program. Parochial schools do not offer special education instructional programs; rather, identified handicapped students attend regular public school programs or programs offered by the REA. Some support services can be offered at parochial schools (e.g., psychological testing services) but for other services (e.g., various therapies) the parochial school student is served on "neutral" ground.

Special Education Consultants

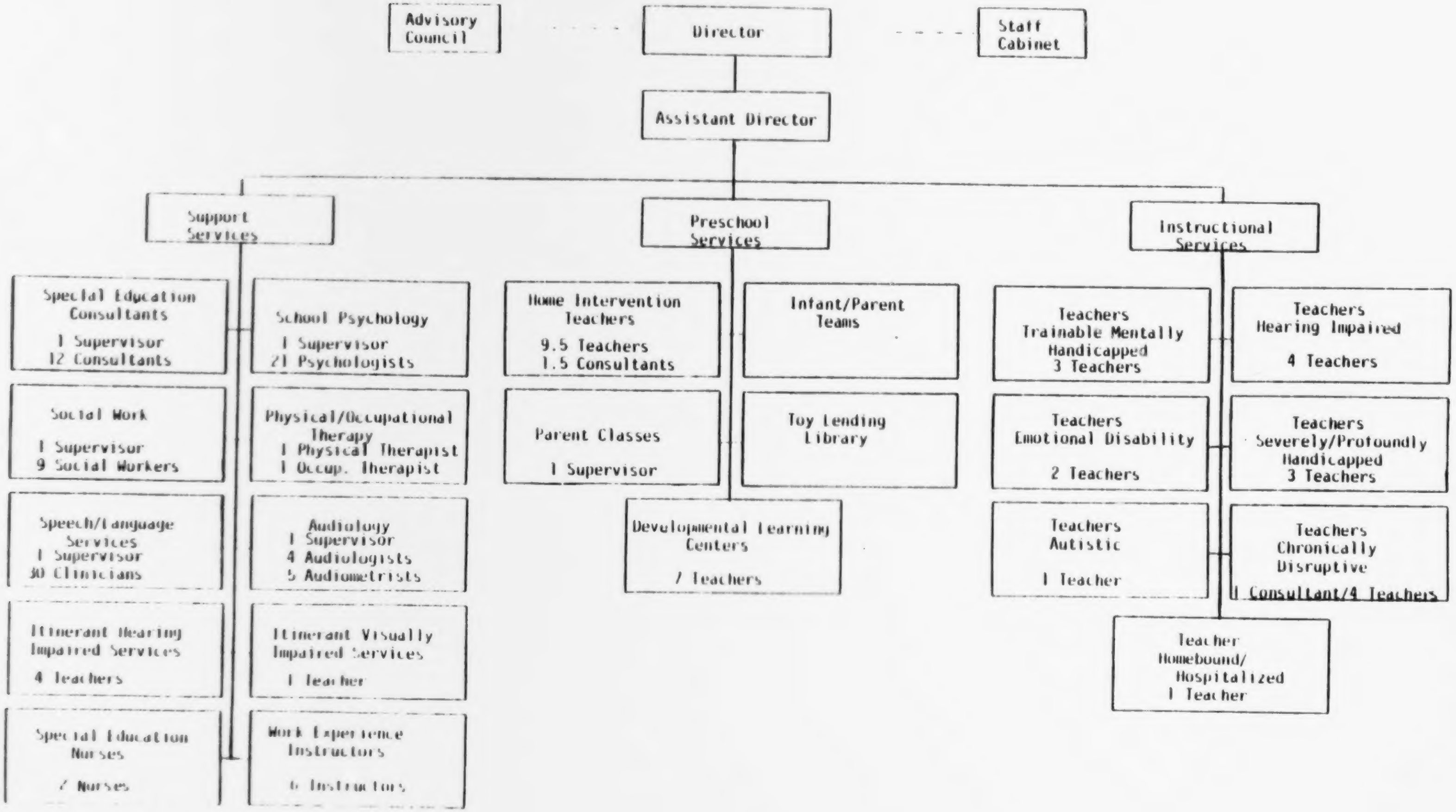
The primary role of the 12 special education consultants is facilitating the delivery of appropriate educational services to handicapped

---

[1] Children are actually served until the age of seven in some cases. At age seven, children who had been in the preschool programs are transferred to special and/or regular programs operated by LEAs or the REA.

Figure 5

Special Education Division Organization and Services


Advisory Council
Director
Staff Cabinet
Assistant Director
Support Services
Preschool Services
Instructional Services
Special Education Consultants
1 Supervisor
12 Consultants
School Psychology
1 Supervisor
21 Psychologists
Social Work
1 Supervisor
9 Social Workers
Physical/Occupational Therapy
1 Physical Therapist
1 Occup. Therapist
Speech/Language Services
1 Supervisor
30 Clinicians
Audiology
1 Supervisor
4 Audiologists
5 Audiometrists
Itinerant Hearing Impaired Services
4 Teachers
Itinerant Visually Impaired Services
1 Teacher
Special Education Nurses
7 Nurses
Work Experience Instructors
6 Instructors
Home Intervention Teachers
9.5 Teachers
1.5 Consultants
Infant/Parent Teams
Parent Classes
1 Supervisor
Toy Lending Library
Developmental Learning Centers
7 Teachers
Teachers Trainable Mentally Handicapped
3 Teachers
Teachers Hearing Impaired
4 Teachers
Teachers Emotional Disability
2 Teachers
Teachers Severely/Profoundly Handicapped
3 Teachers
Teachers Autistic
1 Teacher
Teachers Chronically Disruptive
1 Consultant/4 Teachers
Teacher Homebound/ Hospitalized
1 Teacher

BEST COPY AVAILABLE

childen. This involves consultation with special and regular teachers, parents, and LEA administrators. Consultants also serve as the director's designee in assigning weights to handicapped students (as explained previously in the section "Director of Special Education").

Speech/Language Services

Thirty speech and language clinicians are responsible for the evaluation and remediation of language and speech disorders. All children are eligible for screening services. In the 1981-82 school year, 3,645 children were screened and 1,893 received comprehensive evaluations. Over 1,300 children received regularly scheduled therapy sessions, while 900 more students were involved in speech/language improvement programs. Only the 1,300 children who received regularly scheduled therapy sessions are counted as "handicapped students."

School Psychological Services

Twenty-one school psychologists provide an array of testing and program services. Although the largest proportion of staff time is devoted to psychometric testing and the preparation of psychological evaluations, the psychologists provide many other services, including classroom observations, direct counseling, parent conferences, and teacher and parent group inservice programs. In addition, they initiated nine new research projects and continued several others.

Physical and Occupational Therapy

Two part-time physical therapists and one part-time occupational therapist served the entire Midland area this year. They provided diagnostic and therapeutic services to support students with physical disabilities and limitations. They evaluated 150 students and provided direct services and consulted with other staff.

School Social Work Services

Nine full-time school social workers and the supervisor of this unit, part-time, provide direct social services to the nine-county area. Their services are aimed at improving the ability of the special student to adapt to the demands of school, peers, family, and community. School and community awareness of the social needs of handicapped students is a priority, and improved parent/school relations ranks high on the list of priorities for the unit. They provide workshops for teachers, on one end, and prepare parents to become more involved in their child's educational program, on the other.

Audiology Services

The REA employs four audiologists and five audiometrists who provide a number of diagnostic and audiological services. Although these services are part of the Special Education Division offerings, they extend beyond handicapped children, since they include hearing screenings for all children. Administratively, the audiological staff reports to the Supervisor of Hearing Conservation/Education, who also supervises the teachers of hearing impaired students and the special education nurses (explained below).

Itinerant Teachers: Hearing Impaired

Four itinerant teachers served a total of 52 hearing impaired students in the Heartland area in 1981-82. This included infants, preschoolers, and school-aged students. Approximately half of the 52 students received direct services while the remaining half were on monitor programs.

Itinerant Teacher: Visually Impaired

During the 1981-82 school year, 22 visually impaired students were served by one itinerant teacher of the visually impaired. The type of services each student received depended on his or her individual needs, with some receiving regularly scheduled instructional sessions whereas others were accommodated through consultation with their classroom teachers and the use of specialized equipment and/or materials.

Students who receive direct instruction from the itinerant teacher tend to be preschoolers. Older students, for the most part, attend regular classes with the use of materials such as Braille, magnifiers, and large print and/or talking books, many of which are borrowed from the DPI.

The itinerant teacher serves as a member of the Infant/Parent Team for assessment and programming when the child has a vision problem.

Special Education Nurses

The Special Education Division has maintained two special education nurse positions for the past five years. They serve in support roles to the REA special education instructional programs and to the various services offered through the preschool program (explained in the following sections). Special education nurses provide direct nursing through first aid administration, health teaching units, dental and health needs supervision, monitoring of immunization records, family counseling, and direct nursing therapy and consultation.

Work Experience Instructors

During the 1981-82 school year, five work experience instructors provided career education, vocational training, and work adjustment services to secondary handicapped students. Work experience instructors provide job supervision, career/vocational assessment, and arrange community work sites for students. Student performance is monitored by the instructor as well as by a work site trainer or resource person.

Special Education Instructional Programs

REAs may provide instructional programs at the request of local districts when the provision of such programs is not otherwise locally practicable. Of the 198 special education instructional programs in the

Heartland area, the REA Special Education Division operated 32; although, of course, it provides support services to all 198. The REA instructional programs are primarily self-contained classes, that is, classes or programs that serve moderately and severely handicapped students who spend their school day in separate classrooms or school buildings. Some programs provide contact with regular education students/programs (explained more fully in later sections). The REA Special Education Division staffs each instructional program/classroom with staff members who are employees of the REA. Teachers in the LEA special education instructional programs are employees of the LEA that operates the program.

The LEA special education programs tend to serve students who are mildly handicapped and who spend a part or most of their school day in the regular classroom. Thus, LEAs tend to operate the resource room programs, whereas the REA runs most of the self-contained programs. This is a reasonable division of responsibility since moderately and severely handicapped students appear in fewer numbers and thus make it impractical for most LEAs to generate enough students to operate their own classrooms.[1] Thus, the REA tends to serve low incidence populations in self-contained programs; the LEAs operate resource programs for mildly handicapped students and some self-contained programs and programs with limited regular class contact for moderately handicapped students who come from both the home district and other districts; and the sending LEA pays tuition to the receiving LEA or to the REA, whichever provides the program.

In addition to the instructional programs that can be characterized as categorical classroom operations (serving specific categories of exceptionality), the REA provides some instructional programs/services that are best described as generic or cross-categorical because they provide services to multiple categories of handicapped students.

The following sections describe the REA special education instructional services very briefly. The generic programs/services are presented first, followed by the categorical programs. Here again, our purpose is merely to give the reader an overview of the array of services. More will be said about service and program operation later.

Homebound/Hospital Tutors

Several part-time personnel (totalling 1.0 FTE) are employed to provide home or hospital instruction to students who, for medical reasons, cannot attend regular programs. The tutors provide direct instruction in the home or hospital on a daily basis for some academic subjects and coordinate instruction on other topics with the regular program. The child's regular or special teacher provides supplemental materials and assignments. Approximately 140 students were served in this manner, for varying lengths of time, during this school year.

---

[1] As we shall explain later, however, gathering even enough mildly handicapped students to operate resource programs is difficult for some districts.

Trainable Mentally Handicapped and Severely/Profoundly Handicapped

The REA operated seven TMH classes and three S/PH classes in the nine-county area. The classes are located in regular school buildings, some DLCs, and in two self-contained facilities in Wonder Bay. Although the classes are located in certain LEAs and REA facilities, students are sent to them from all districts in the Midland area that have students who can best be served in such programs.

The programs cover the entire age range (elementary, junior high, senior high) and are staffed by teachers who are REA employees. Programming focuses on community functioning and recreation/leisure, domestic, and vocational skills.

Programs for Emotionally Disabled Students

The Special Education Division operates three types of educational programs. All three types of programs are self-contained; two of the three are in facilities that are separate from the regular public school systems.

One of these separate-facility programs is a junior high residential program operating out of a boys ranch setting just outside of Lincoln Center. Thirteen students were served at the ranch during 1981-82. Students are placed in the program who require a highly structured environment. As students demonstrate the ability to profit from a less structured setting, they are returned to traditional educational programs in Lincoln Center or in nearby districts. This one facility serves the entire Midland area and, at times, has served students from other REAs.

Another separate facility (also in Lincoln Center) is maintained for junior and senior high students who have been labeled "chronically disruptive." This is a unique category of exceptionality which has been mandated by the state legislature for students who have been excluded from school. These students can be described as youngsters who need a highly structured program to be able to maintain satisfactory relations with peers and adults. The program, serving 30 students in four separate classrooms, consists of a highly structured behavior management system, individualized academics, and counseling. The teachers are REA employees.

The third type of educational program operated by the REA serves elementary education students in self-contained classrooms. The REA operates two such classes, one in Wonder Bay and the other in Lincoln Center. Students in these programs have some contact with nonhandicapped students but spend most of the school day with their REA-employed teacher.

Autistic Program

This program is a 3-year, federally funded state demonstration project to develop a rural delivery system for autistic children. It is currently in its second year of funding and, by design, serves the entire Midland area. The REA competed with seven other REAs for the project and was one of four to receive funding.

The project has three components: a diagnostic clinic, which has to date identified nine students with six more pending; a self-contained special class and the development of a K-12 curriculum; and support and training for parents, LEA personnel, and REA staff. The model and materials will be developed by existing REA special education instructional and support staff.

Hearing Impaired Programs

Four teachers of the hearing impaired and five interpreter/aides served a total of 27 hearing impaired students in 1981-82. The 27 students were served in four hearing impaired classrooms: two preschool, one elementary, and one junior high. Another 52 hearing impaired students were served by itinerant teachers. Hearing impaired students who are served in resource rooms and attend regular classes are assisted by interpreter/aides. The age of the 79 hearing impaired students ranged from 18 months to 20 years. Eight other students attend the state school for the deaf.

Preschool Programs

Children from birth to age seven and their parents are served through a number of programs within the preschool unit. There are 19 preschool staff members, who are supported by other REA special education personnel at various times and for various activities. Several interrelated programs are provided: home intervention, assessment and intervention activities conducted in the home by a home teacher who trains the parents to deliver the intervention; parent/infant team, an *ad hoc* team of REA preschool and support staff who provide interdisciplinary support to children ages 0-2 and their parents; parent classes, 8 weeks of training which is designed to help parents understand and work with their children; materials designed for a home study course for parents who are unable to attend classes; Developmental Learning Centers (DLCs), five centers located throughout the area serving 3 to 7 year-olds who are developmentally delayed; and a toy lending library which makes instructional toys available to parents for home use.

Special Education Advisory Council

The Midland REA maintains a 28-member Advisory Council which is made up of parent, teacher, and public and parochial school representatives. Each of the nine director districts is represented by an administrator (superintendent or principal) from two LEAs within it. Six parent representatives, three special education teachers, and an administrator from one of the area's parochial schools round out the council membership.

The council meets twice each year to discuss Midland programs, problems, and issues. Meetings typically begin with an information sharing session during which the special education division updates the council on current and proposed changes in the state and REA special education rules and regulations, the introduction and progress of new programs, and the results of any state monitoring activities that may have been conducted. Suggestions, questions, and/or concerns of the council relative to changes in procedures are noted by the director for future use at the annual meeting at the DPI of the REA directors of special education.

The information sharing session is followed by an open discussion period, during which council members are free to raise issues about special education services. Here again, issues that cannot be addressed at the REA level are presented to the DPI for clarification and/or a response.

Minutes are transcribed and included in the Midland area annual special education plan (described in the section, "Authority and Responsibility for Special Education").

MIDLAND REA EXPENDITURES

Reviewing the number and types of services provided by the REA quickly leads to the question, "How much does all this cost?" The revenues received for the three REA divisions are generated through different formulas and must be kept in separate operating budgets. Further, an additional distinction is made between special education instructional and support programs, which also must be kept separately. Thus, the four primary cost categories are special education support services, special education instructional programs, educational services, and media services. In addition to the costs of the three divisions, there are two other general categories of program costs: administration costs and plant operation and maintenance costs. In total, six program cost categories are used to manage the Midland REA budget. Figure 6 lists the costs for the six types of direct program costs and illustrates the proportion of the total budget amount allocated to each cost category.

Central administration costs are calculated as indirect costs and are prorated back to each division. Plant operation and maintenance costs reflect the dollars used to maintain the facilities owned or leased by the REA and include a separate line for the operation and maintenance of the special education satellite offices.

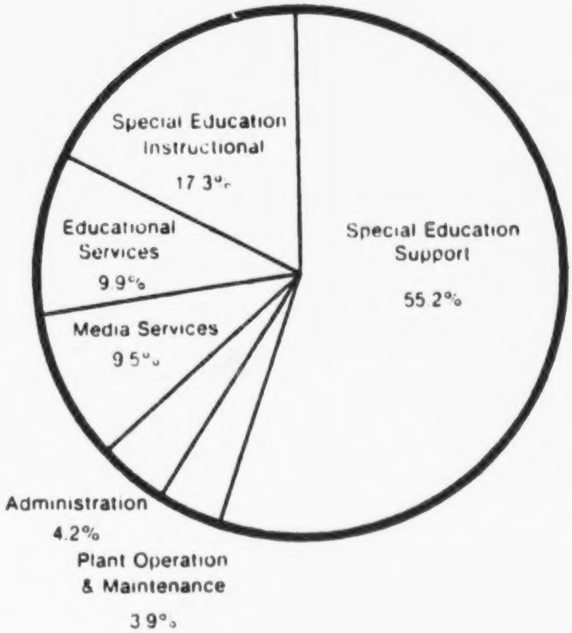
Program costs within each category are subdivided into categories of expenditures. Figure 7 lists these expenditures and illustrates the proportion of total expenditures for each category.

In November of each year, the REA submits its program plans for the following school year to the State Board of Education. One month later, the operating budget is submitted for review. After some adjustments, which typically occur, the REA is given final approval on the operating budget. In recent years, some reductions have occurred. For example, the Midland REA's 1981-82 approved budget was reduced by about $250,000. Of this amount, approximately $165,000, $69,000, and $15,000 in cuts were absorbed by the Special Education, Educational Services, and Media Divisions, respectively. Although the other two divisions managed to get by with adjustments in the level of some services, the Special Education Division lost seven positions. The reduction, however did not cause major difficulties since six positions had gone unfilled from the previous year and the seventh position was easily handled through attrition.

The state's biggest expenditure is in education. The budget cuts which have occurred over the last 2 years have resulted from ailing national and state economies as well as from declining enrollments. Budget cuts were passed down to REAs and LEAs in several different ways. For the most part, the cuts were made by adjustments in the state aid formula and legislative changes in the ways REA dollars are generated. (see section: "Funding Regional Educational Agencies").

Figure 6

Midland REA Expenditures 1981-82



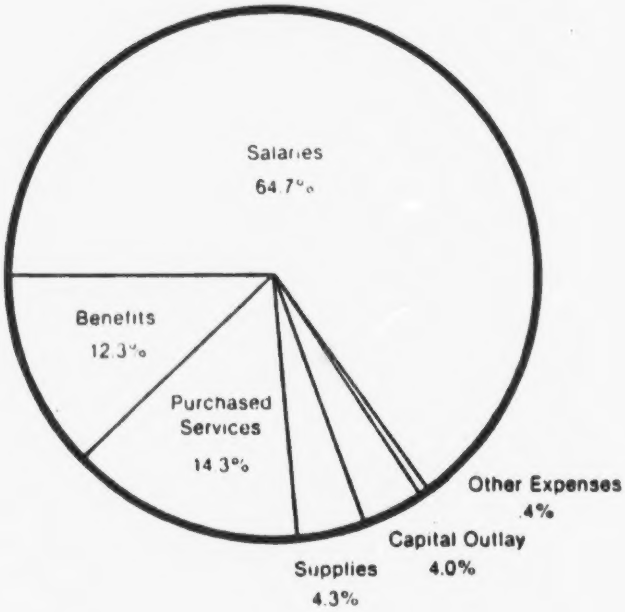
Direct Program Costs

Special Education Support	3,102,044
Special Education Instructional	968,555
Educational Services	558,931
Media Services	535,136
Administration	238,615
Plant Operation & Maintenance	219,755
Total	$5,623,037

BEST COPY AVAILABLE

Figure 7

Midland REA Categories of Expenditures



Categories of Expenditures

Salaries	3,635,572
Benefits	690,931
Purchased Services	806,587
Supplies	241,833
Capital Outlay	227,209
Other Expenses	20,903
Total	$5,623,037

EVOLUTION OF REGIONAL EDUCATION AGENCIES AND SPECIAL EDUCATION SERVICES

One cannot separate the events leading to the development of the REAs from the evolution of special education services in this state. The two stories are really one; the development of each has contributed to the other. As we have seen, the REAs were developed primarily to provide special education. But, the development of isolated exemplary special education programs in the state provided the impetus for REAs.

The REAs were not the first type of educational unit to be placed intermediate to local school districts and the DPI. As a matter of fact, REAs represent the fourth type of intermediate unit and the third type of regionalized service agency to be established.

The County Superintendency

The first intermediate unit structure to be established dates to the mid-1800s when the position of county superintendent was interpolated between local districts and the DPI. The county superintendent was an elected official with direct power over all districts in a county. One should not confuse the county superintendency with county districts, however. The local districts remained independent, even though they were all supervised by the county superintendent and funded, in part, by a county-wide tax levy. Imagine the task, with more than 5,000 districts spread across 99 counties state-wide! It's not difficult to understand the DPI's impetus for creating the county superintendency.

School District Consolidation

Over the 60-year period from 1910 to 1970, the number of school districts decreased from over 5,000 to 454 (presently 447). Three factors influenced this reduction. The advent of school buses created a trend toward consolidation since transportation to central locations was then possible and attractive to school systems. In 1953 it became official state policy to encourage school reorganization. The 1953 statute read:

> It is hereby declared to be the policy of the state to encourage the reorganization of school districts into such units as are necessary, economical and efficient and which will ensure an equal opportunity to all children of the state (emphasis added).

This may have been the legislature's way of testing the waters--no reorganization mandate, just a warning. But the bill did contain a mandate of a different sort. County boards of education were directed to conduct detailed studies and surveys of school districts for the purpose of promoting reorganization. So, in one declaration the state tested the waters and studied how best to proceed. Apparently, the waters were fine, and the studies helped chart the course for the next wave of reorganization, which began in 1957 as a result, finally, of a formal legislative mandate. The mandate did not create mass resistance since it was aimed at eliminating one-room school houses, a practice that had seen its day anyway. One must assume that this course of action was predicated on the results of the reorganization studies conducted by the county boards in 1953. The 1957 statute disallowed districts to hire teachers if their previous year's daily attendance was below 8 students and if fewer than 10 students would be enrolled the next year.

Also, that same year, two or more adjacent counties were allowed jointly to employ a superintendent. This made sense; the number of districts would be reduced in any given county due to the 1957 mandate and, in light of the reduction in districts that had already occurred with the introduction of school buses, one superintendent could handle the job. Although this action did not create a new type of intermediate unit, it did make the existing ones (county superintendencies) larger, while at the same time it reduced the number of administrative entities with which the DPI had to deal. All in all, a neat package; only the tiniest districts had been eliminated and the system was tightened administratively. So far, so good.

In the next round of consolidation activity, the DPI did not fare so well. In 1965, the legislature mandated that by July 1, 1966 all areas in the state were to be included within a school district having twelve grades. To effect this policy, the legislature granted authority to existing county boards of education to "attach" any area not a part of a twelve-graded district and to make it part of such a district. A district, however, which was included in a reorganization petition prior to or on April 1, 1966, was not subject to attachment. The legislature went beyond simply encouraging reorganization--either reorganize or be attached.

There is a pattern here that we will see again as this history unfolds. The state, motivated by economy, efficiency, and equality, delegated the responsibility for school reorganization to local units of the educational system. In 1953, the county boards of education conducted the studies which guided the 1957 consolidations, and, in 1965, they were given authority to attach neighboring districts to one another. The state's goal: better, more efficient, more equitable schools through reorganization. The state's method: let the locals work it out. Of course, when the state let the county boards work it out, they also let them take the heat. How hot was it? Very. The dissidents united. People who were concerned with the dismantling of small schools formed an advocacy/ lobbying group that exists today: STOP (Stop Taking Our Pride). Although this group had little effect on the reorganization of school districts in 1965-66, they have had a greater impact on the quality of small schools in this state, as well as on the evolution of the REA concept. What's more, they sent a clear message to the state that "enough is enough."

The 1965 high school district legislation has since been amended; currently it declares that "if any school district ceases to maintain twelve grades, it shall reorganize within six months or the state board shall attach the school district not maintaining twelve grades to another district." It appears that the state board of education has recovered the task of school reorganization, but, as we shall see, the heat has been transferred to another educational unit.

Before we get too far ahead of ourselves, let us return to 1965. Two other important pieces of legislation were passed then that have a bearing on the evolution of the REA concept.

Area Schools

Legislation also was passed in 1965 that divided the state into 15 "merged areas," in which two or more school systems could merge resources to establish and operate a vocational school or a community college, or a combination of both. The law was permissive for the first five years but required all area of the state to be in a merged area by July 1, 1971. These area schools represented the second type of intermediate unit (the first was the county superintendency) and the first type of regional service agency. The MCC in Lincoln Center is an example of an area school; a combined community college and vocational/technical school.

Besides being one of the historical antecedents to the REA concept, the area schools are important to our story of the evolution of REAs and special education for several other reasons. First, when the REAs were created, they were to share geographical boundaries which were coterminous with those of the area schools. Second, REAs were to use a governance structure which was identical to that of the area schools. This, in itself, was a point of controversy in the evolution of the REA system, a point that will be expanded upon later. Third, because area schools and REAs eventually were to share the same service areas, the legislation creating the REAs specified that REAs could not provide programs or services which are or may be provided by the area schools. Not only was duplication prohibited, but cooperation among area schools and REAs was encouraged. The area schools were authorized to provide the first two years of college work as well as an array of vocational education programs. One such vocational program was to serve persons who have academic, socio-economic, or other handicaps which prevent succeeding in regular vocational education programs. This authorization is important because it demonstrates an early commitment to the needs of handicapped students (1965, prior to P.L. 94-142 and the REA special education delivery system) and, as we shall see, a program area that is a natural point at which the REAs and the area schools can converge. It is also important to note that the availability of vocational programs for handicapped students made programming easier for students who were beyond high school age. Finally, when the first plans for the REAs were introduced, they called for the governance of the REAs to be subsumed by the existing area schools' governance structure. Obviously, as noted above, this did not happen; but the important thing about the proposal is why it was rejected and what were the trade-offs that were made. As we will see, special education lost something in the deal but gained what has amounted to its most powerful trump card.

Joint County School Systems

The third piece of legislation passed in 1965 that affected the evolution of the REA concept was the "joint county school system" statute. You will remember that, in 1957, two or more adjacent counties were allowed jointly to employ a superintendent although each county maintained its own board of education. The 1965 legislation allowed two or more counties to merge their boards of education forming a multi-county board to govern districts in the combined counties and to be administered by a single joint county superintendent. Whereas the joint hiring of a county superintendent by two or more counties authorized in 1957 can be characterized as an efficiency measure, the merging of individual county boards into a "joint county board of education" represented a third type of intermediate unit structure that organized governance and administration on an area or regional basis and the second type of regionalized services arrangement. (Area schools were the second type of intermediate unit and the first type of regionalized service agency, even though they were not established until 1971.) Thus, with the combined authorizations of the 1957 and 1965 legislation, school systems had three options for organizing themselves.

1. single county superintendencies: independent districts within one county, one board, one superintendent (1858 statute)

2. joint county agreements: independent districts in two or more counties, one board in each county, one jointly employed superintendent (1957 statute)

3. joint county school systems: independent districts in two or more counties, one board, one superintendent (1965 statute)

The 99 counties of the state elected one option or another depending on the local context and politics. By 1975 the following state-wide configuration emerged: 23 single county superintendencies, 18 superintendents in 46 counties with joint agreements, and 10 superintendents in 30 counties with joint county school systems. Thirty percent of the counties, in effect, opted for an area approach to school organization; nearly one half of the counties maintained their own boards of education but hired superintendents jointly with adjacent counties; and about one fourth of the counties chose to remain as single-county units. But then, on July 1, 1975, all county and joint county school systems were abolished and the REA concept was ushered in. But before we move to that point, let's see what effect the joint county systems had on education, and particularly on special education.

Evolution of Special Education within the County Systems

To understand the evolution of special education, three points need to be made. First, just after World War II the special education needs of the state were recognized and the legislature authorized such services on a permissive basis. This move was consistent with what was happening then on the national scene. The authorization meant that school systems could, but were not required to, provide special education services. Secondly, when the county superintendency was created in 1858, it was a popularly elected position. However, in 1913, the law changed so that both the county board of education and the county superintendent were selected by the presidents of the local districts' boards of education. A further change occurred in 1947 when the county board of education became a popularly elected body and, at the same time, the superintendency became a three-year appointment. Thus, the governance of the county system came under more direct control of the county residents. When joint county agreements and joint county systems emerged in 1957 and 1965, respectively, the county boards of education remained, in their various configurations, popularly elected bodies.

The third ingredient in this mix relates to the overall goals expressed by the state legislature when it first encouraged and later required school reorganization. Economy and efficiency were certainly realized under the joint county structure. Ironically, however, the third goal of "equality" became even more elusive as the first two goals were achieved. Schools became more efficient, and some became efficient enough to start offering new or expanded programs like special education, for example. As a result, districts became unequal in terms of the number and quality of programs they offered. But more on this later. With fewer schools and school districts to supervise as a result of the high school district consolidations, the discretionary time of the county superintendent was increased. With the formation of larger and fewer school districts the county superintendent role became one of record keeping, for the most part.

These three events, considered together, set the stage upon which the special education story began to be acted out. The curtain can now be drawn; but, first, there is one more player: the Association for Retarded Children (ARC)[1]. The ARC, a national advocacy group of parents and professionals with locally based affiliates, was formed in 1946. During the time in question, between 1947 and 1965, local ARCs began to be organized around the state. Naturally, their existence was spotty and dependent on the initiative of individuals (primarily parents) in various communities. County ARC groups started classes for trainable mentally handicapped youngsters--hired a teacher and set up the programs in abandoned rural school houses. Once the programs were operational, the county board of education was asked to take them over. In addition to organizing these programs the ARC groups were a strong voice in advocating for handicapped children in the state. The executive director for the state ARC was a strong lobbying force for the REA concept and the state special education mandate.

So, curtain up! Let us begin by reviewing the pieces that were in place to this point in the evolution of special education services. Table 4 presents the significant events that occurred over the 30-year period from 1946 to 1975.

---

[1] Currently, the Association for Retarded Citizens.

Table 4

Educational Reorganization and Development of Special Education

Timeframe	Events
1946	Permissive legislation allowing but not requiring special education services.
	Establishment of National ARC and local ARCs in certain areas of the state.
1947	County Boards of Education popularly elected.
1953	State policy established to encourage school reorganization and to conduct feasibility studies.
1957	Consolidation of very small districts (serving fewer than 10 students).
	Joint County Agreements: joint hiring of superintendents by two or more counties (counties maintained separate boards of education).
1965	High school district reorganization via attachment.
	Establishment of Area Schools: special purpose intermediate units.
	Joint County School Systems permitted: one board of education, one superintendent.
1965- 1975	With fewer school districts to supervise, and with resources freed by increased efficiency, some county superintendents began to offer additional educational services, including special education.

By 1975 when the REA concept was introduced, 51 county units were operational: 23 single county systems, 18 joint county agreements (46 counties), and 10 joint county school systems (30 counties). Although the type of county unit had some bearing on the extent and quality of special education services available in any given unit, the real impetus for development of special programs and services came from two other directions. In both cases, the development of special education programs resulted from the initiative of individuals and/or groups at the local (district, county, joint county) level. First, county and joint county superintendents who were interested, knowledgeable, and/or concerned about special education initiated such services. Remember that they could only now consider expanded services of any type because their load had been reduced, which increased discretionary time. Second, parents of handicapped children individually, in groups, or in concert with the ARC began to request, lobby for, and, in some cases, demand services for their children. Also, in some communities, the ARC began to provide its own programs.

And so we see that, between 1947 and 1975, school systems grew larger in size and fewer in number. This resulted in more economical and efficient school systems. As the systems improved, the county superintendent's role changed in practice. The superintendents could begin to think about expanded services (special education and regular curriculum services) because basic needs were being met. Even so, the move to offer special education services was not unanimous; rather, it was idiosyncratic. Whether these services were provided depended on the individual--the superintendent, the parent, the advocate, or the combination of all three in harmony, or, in some cases, at odds.

The first services to be provided were psychological services, speech services, and programs for trainable mentally handicapped children. The ARC was most involved in helping to establish and, in some cases, in operating these latter programs.

Because they were dependent on local initiative and politics, services developed unevenly across the state. County superintendents who were more aware provided better and more programs and services. More active parents and parent groups pushed harder for programs and had different degrees of success. This was to be expected under a "permissive" system. However, another factor contributed to the uneven pattern of special education program development.

Funds with which to operate the programs and services were not built into the state school finance system. Even when the state allocated special education reimbursement dollars at 26 percent of the costs of the programs, the money distribution scheme was, in the words of the current state Director of Special Education, "helter-skelter" and mired in "red tape." Newer programs tended to get more money than established programs and services plateaued because of the limits placed on reimbursement. And, most significantly, where a student lived determined the quantity and quality of services he received. Moreover, only 25 percent of the school-aged children who needed special education services were receiving them.

Certain rural county and joint county units literally became "special education centers." By 1975, some units were providing special education programs and services that would rival those provided in some of the current REAs. Nevertheless, a problem emerged. Ironically, the problem was created by the very fact that some units had developed exemplary programs and services. The legislature was "plagued with complaints about inequitable services."

Recall, if you will, the three goals of the state legislature when they encouraged and later required school reorganization: economy, efficiency, and equality for all children in the state. The first two goals had been accomplished. In fact, the introduction of special education was possible because those goals were met. But, by meeting the first two goals, the chances of reaching the third goal, equality, had become even more remote. Clearly, something had to be done.

Emergence of the REA Concept

One should not assume that the legislature did not have a solution available to it. In fact, the idea had been formulated and lay waiting for its time to come. The obvious solution was the operationalization of the REA concept. The basic plan had been written ten years earlier, in 1964. But it was controversial and could not pass muster at the state house for four reasons. First, given the 1957 and particularly the 1965 bout with school reorganization, the idea sounded too much like consolidation or, at least, centralization to be politically acceptable in the mid-'60s. This was true not because legislators did not understand it, but because they felt their constituents would not understand it. Communities that lost their schools through the consolidation process were, more often than not, bitter and skeptical of further state interference in educational decision making that would affect local school systems. Also, there is evidence to suggest that the original plan for REAs called for the consolidation of all local districts into "county school districts," that is, 99 school districts serviced by 15 REAs. The plan was unpublicized, but it was not a well-kept secret. Second, the REA plan was massive and, as such, no equitable way to fund it was available in 1964. Third, there was no real motivation for serving all handicapped students equitably; P.L. 94-142[1] was 10 years away.

Finally, a political problem emerged that turned local districts against the plan. Initially, it was proposed that the REAs become an additional function of the area schools. This meant that the area schools' administrators and their boards of directors would assume governance and administration responsibilities for the REAs. This concerned the local districts. They felt that the area schools would not be able to address the needs of local districts because of their postsecondary emphasis. Further, the districts questioned the area schools' expertise relative to special education. The local districts wanted the administration and governance of the REAs to be separate from

---

[1] The Education for All Handicapped Children Act passed in 1975 which guaranteed all handicapped children the right to a free appropriate public education in the least restrictive environment.

that of the area schools; they wanted a governance system that would be more responsive to local needs and they wanted the REAs to be operated by people whose efforts and expertise would be directed toward the traditional K-12 segment of the public school system.

State-level special education staff and advocates, however, wanted the REAs to be run by the existing area schools. Their rationale was that one board and one set of administrators for both the area schools and REAs would assure the smooth transition of handicapped students from the public schools into the vocational training programs offered by the area schools. Thus, a stalemate between local districts and special education planners and advocates emerged to create the fourth barrier to the introduction of the REA system as it had been originally conceptualized.

What, then, happened to change the political scene in 1974 when the REA legislation finally was passed? As one might expect, a combination of events took place. First, there was a change in the basic REA plan that eliminated the idea of consolidating local districts. Under the revised plan, all local districts were to remain intact. Further, the plan to make the REAs part and parcel of the area schools was abandoned. Without the threat of consolidation, rural districts began to see the REA concept as a means of saving their schools. The fact that REAs would retard consolidation while, at the same time, providing access to needed services and allowing small districts to be at least somewhat cost-effective became a big selling point for the concept. The elimination of the part of the plan which gave the area schools the administrative and governance responsibilities for the REAs did not come without a price, however. The trade-off for the local districts to secure a separate administrative and governance structure for the REAs resulted in an important advantage for special education. The LEAs were anxious to make the trade at the time, however. In the trade, the LEAs got an REA administrative and governance structure that was independent of the area schools and gave up the "power" for special education authority that currently rests with the REA directors of special education. Special education gave up the link between K-12 programs and vocational training but gained the "awesome authority" of the REAs' directors of special education for all special education matters within the designated regions, a trade that certainly has worked to the advantage of handicapped students.

Second, the legislation creating the REAs was combined with two other pieces of legislation. One created the funding mechanism for the REAs and special education services and the other created the state's special education statute. Therefore, a "package-deal" was created. In one law we find subsumed the REA system, state special education policy and procedures, and a mechanism to fund the entire enterprise. Third, during the period of time from 1966 to 1974, exemplary special education programs and services had developed in certain districts through the efforts of county and joint county systems and parents and the ARC. Some children were being served but most were not. Complaints from parents and advocacy groups poured in to the legislature; they demanded equitable services. In effect, the unequal development of special education services across the state had created the fuel to sustain a bonfire of pressure. Law suits were being filed in many states and parents and advocates were winning them all. As time drew closer to 1975, the knowledge that the federal government would pass a law to require that special education be made available to all handicapped children and youth exerted influence on states. The mandate from above was sure to come, so why not be ready for it? Besides, advocates for the handicapped knew of the certainty of the federal law and this further intensified their lobbying of the legislature. Finally, and not the least significant, was the importance that the people in this state placed on education. The years since consolidation had seen state achievement test scores rise for all students as well as the development of exemplary special education programs. The people were proud of their schools and committed to quality education. The REA concept was sold as the "great equalizer." It was to provide equal access to services to all students, regardless of where they lived in the state.

All these factors combined with, or as the result of, a change in the times made the concept of a regionalized service agency tenable. In 1974, the state legislature passed Senate File 2001 which abolished all county and joint county school systems and replaced them with regional education agencies as of July 1, 1975. SF 2001 included three sections: Chapter 200, Regional Education Agencies; Chapter 300, Procedures for Children Requiring Special Education; and Chapter 400, School Foundation Plan. SF 2001 completely overhauled special education policy in the state; new definitions, new governance procedures, a new delivery system (the REAs), and a new financing scheme.

Chapter 200 has been or will be discussed as a matter of course in describing the Midland REA. The requirements of Chapter 300, likewise, will become clear as we describe special education services in the Midland area. Chapter 400, due to its complexity, will be described in some detail in the next major section, "Funding Regional Education Agencies."

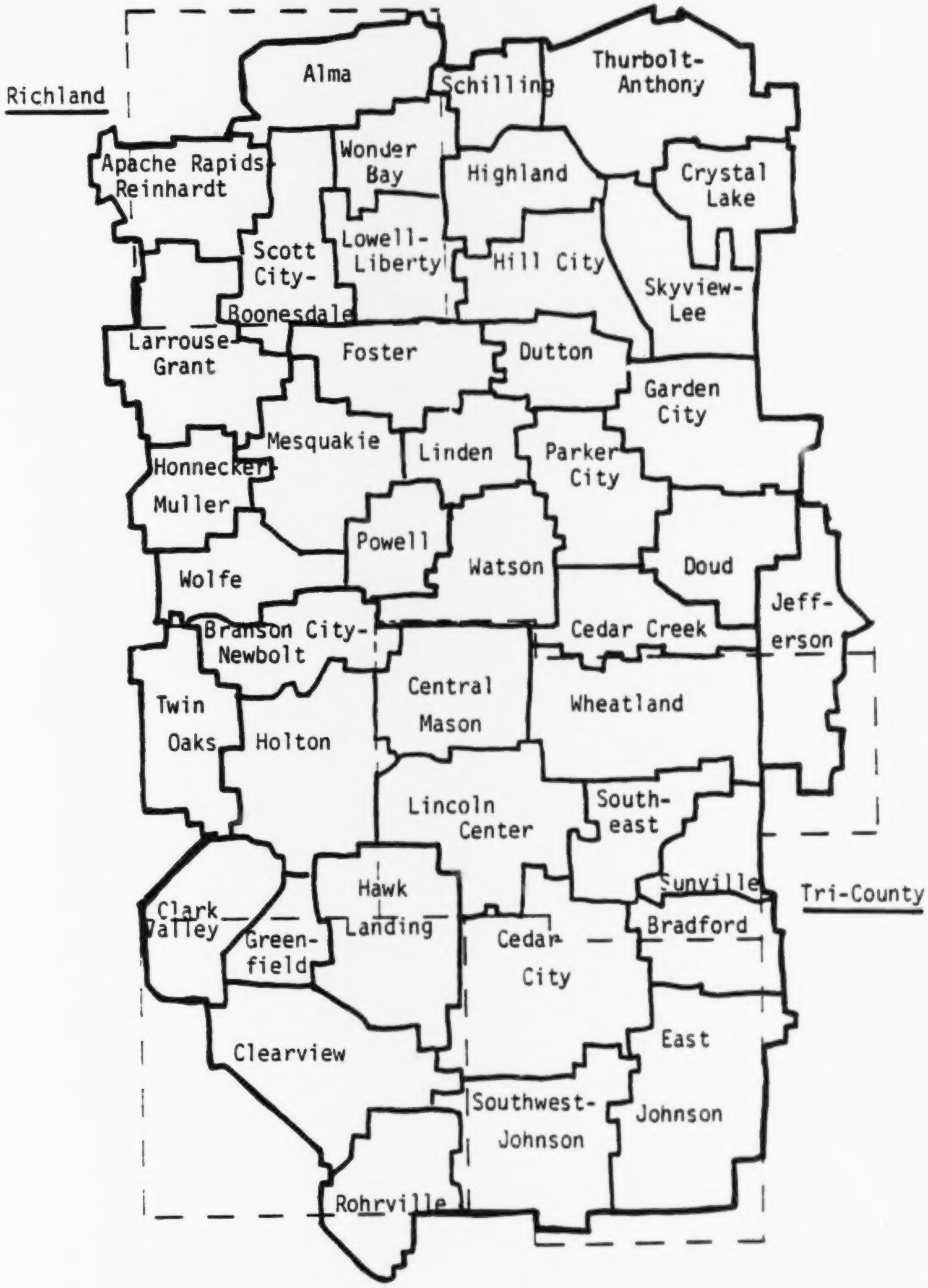
Evolution of the Midland REA

In 1975 when SF 2001 was passed and the REA system was created, the nine-county area currently served by the Midland REA included all three types of county school systems. Two counties maintained single county units and four others operated under joint county agreements (jointly employed one superintendent). The remaining three counties participated in the third type of authorized arrangement (joint county system) and operated the Tri-County Education Agency. Thus, the Tri-County system had been operating special education programs in the three-county area for some time prior to the start of the REA. Some believe that, in its day, the Tri-County system delivered special services as well as the current REA (see Figure 8).

In addition to the Tri-County system, one of the two single county units, Richland County, created a county-wide special education program to coordinate the delivery of speech and psychological services and programs for trainable mentally handicapped youngsters. All LEAs in the county participated in the program, which was housed in the Wonder Bay district. The single-county program evolved into a four-county "loose arrangement" when three adjacent counties began to purchase speech and

Figure 8

Tri-County and Richland Arrangements


Richland
Alma
Schilling
Thurbolt-Anthony
Apache Rapids-Reinhardt
Wonder Bay
Highland
Crystal Lake
Scott City-Boonesdale
Lowell-Liberty
Hill City
Skyview-Lee
Larrouse-Grant
Foster
Dutton
Garden City
Mesquakie
Linden
Parker City
Honnecker-Muller
Powell
Watson
Doud
Wolfe
Jefferson
Branson City-Newbolt
Cedar Creek
Twin Oaks
Holton
Central Mason
Wheatland
Lincoln Center
Southeast
Clark Valley
Greenfield
Hawk Landing
Sunville
Tri-County
Bradford
Cedar City
East Johnson
Clearview
Southwest-Johnson
Rohrville

psychological services from the Richland special education program. Ironically, the three adjacent counties were assigned to the neighboring REA when the boundaries were drawn. The Richland county unit remained in the Midland catchment area, thus severing the ties between it and the three adjacent counties it served (see Figure 8).

So although special education services were not mandated until SF 2001 was passed in 1974, some services did exist prior to that time in the Midland area. But most admit that services were uneven across the region and that where a student lived determined whether he received services as well as the nature of those services. The good programs were concentrated within the Tri-County and Richland County arrangements. With the advent of the REA, more students were identified, better assessment and placement procedures were developed, more services and service options became available, and, in general, more students were served and served better.

When the Midland REA was formed, it was located in Lincoln Center, the largest city in the eight-county region (population 30,000) and the former home of the Tri-County Education Agency. In addition, when the Division of Special Education was formed within the REA, the special education director for the Tri-County Education Agency was hired as the director of special education for the division. His first order of business was to hire the director of special services from the Richland County unit as his assistant director. Thus, the special education talent which had evolved in the area was captured within the nets of the REA. In addition, the superintendent in Wonder Bay (the home district for the Richland special education program) was hired as the chief administrator of the REA.

FUNDING REGIONAL EDUCATION AGENCIES

The most significant aspect of the REA funding mechanism is the role it plays in the success of the REA concept and, for the purposes of this case study, in the success of the implementation of the state special education mandate and P.L. 94-142. Most people view the REA system as the special education mandate. Remember that SF 2001 created the state special education mandate, created the delivery system (the REAs), and created the funding mechanism to make it all possible. Most knowledgeable people at the state level, as well as in the Midland area, believe that LEAs would have resisted Chapter 300 and P.L. 94-142 if the resources to comply with them were not part of the mandate. Without the money, mandates have no teeth; SF 2001 "created a structure that's workable and put the bucks behind it." The DPI's approach: "create an environment where young, motivated professionals want to work within the system;" you need only give them "resources, reasonable loads, and the chance to be creative."

To establish the REA funding mechanism required that the state revise its then current state aid formula to fund the REAs and, thus, special education. Each of the three parts of SF 2001 contained a different aspect of the overall funding scheme and, taken together, they formed an interlocking funding mechanism which modernized state aid for education, funded the REAs, and generated and distributed the dollars to finance special education instructional and support services.[1]

The following sections describe the overall funding scheme. The general state aid formula is presented first, followed by the mechanism used to generate the revenues to fund the REAs, which include media, educational services, and special education support and instructional services.

The Foundation Plan

In order to understand the state aid formula, one must be familiar with several key features of the system: equalization, budget levels, tax base, weighted or budget enrollment, per pupil costs, and allowable growth.

Equalization

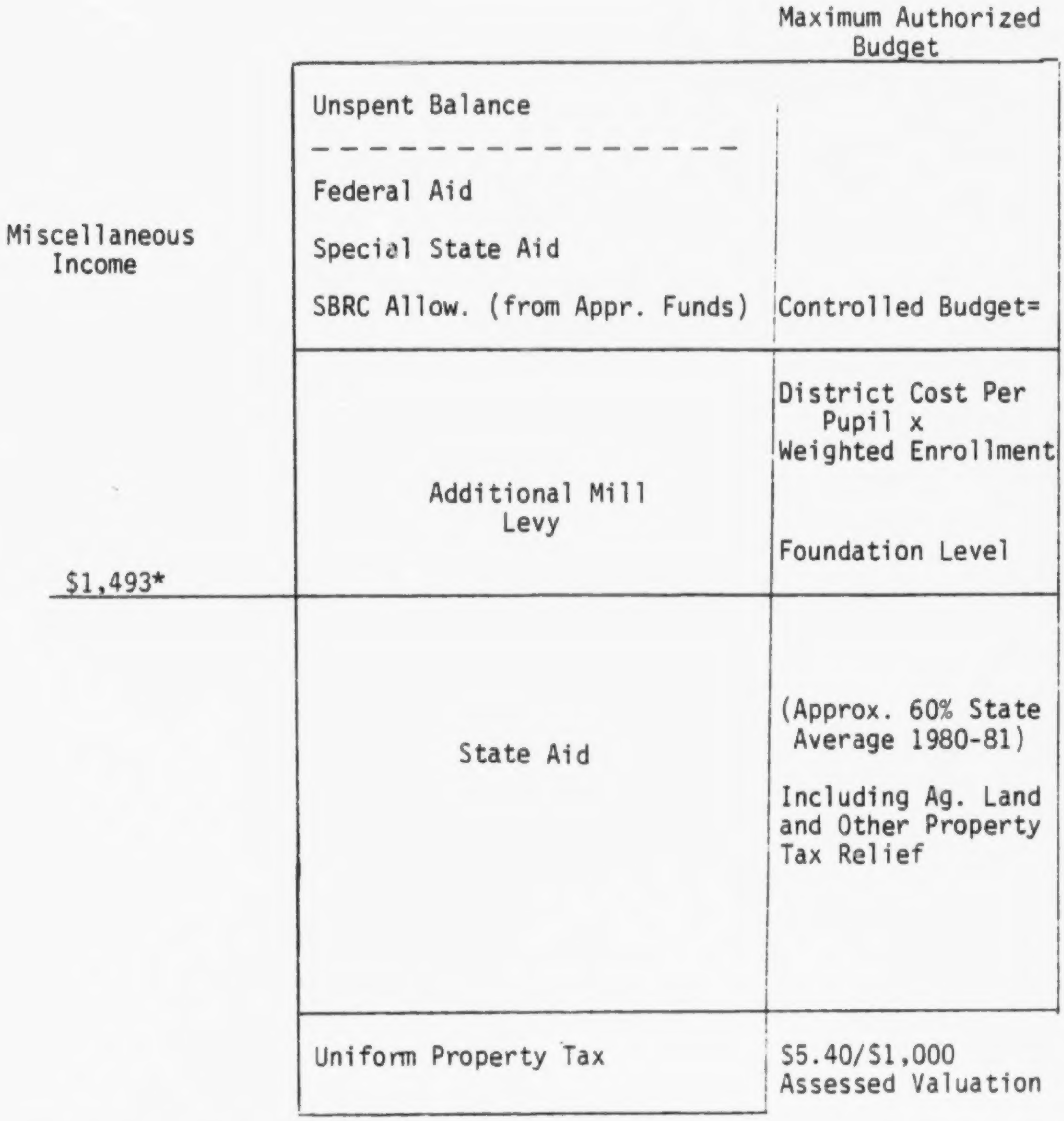
The amount of money contributed by the state to individual districts for education varies on a statewide basis between 40 and 60 percent depending on the property tax valuation of the individual districts. This is accomplished by having each district tax itself at a uniform rate of $5.40 per $1,000 assessed property valuation. The state then pays the difference between the amount of money generated through the uniform property tax levy and the "foundation level," which is a percentage of a state average cost per pupil figure (see Figure 9 and the

---

[1] A new state aid formula had been established in 1972. It was revised and interlocked with the REA and special education legislation to create the overall funding scheme to support the REAs and special education.

Figure 9

Foundation Plan


Maximum Authorized Budget
Unspent Balance
Federal Aid
Special State Aid
SBRC Allow. (from Appr. Funds)
Miscellaneous Income
Controlled Budget=
District Cost Per Pupil x Weighted Enrollment
Additional Mill Levy
Foundation Level
$1,493*
State Aid
(Approx. 60% State Average 1980-81)
Including Ag. Land and Other Property Tax Relief
Uniform Property Tax
$5.40/$1,000 Assessed Valuation

*Includes REA Support Flow-through Dollars discussion below). An agricultural tax relief adjustment is built into the system which, in effect, acts as an indirect school credit much the same way that a Homestead credit does for residential property. Without this relief, the average mix of state aid to local property tax contributions for education would be closer to a "50-50 split" on a statewide basis.

Budget Levels

Three separate budget levels are used to establish LEA budget revenues and the state's contribution to education (refer to Figure 9). The Maximum Authorized Budget refers to the total set of revenues a district has available to it; this includes unspent balances, federal aid/grants, and any special state aid or budget adjustments. Naturally, these revenues are variable from district to district and from year to year. They are simply added to the controlled budget level, which is the critical level for calculating a district's revenues.

The Controlled Budget is calculated by multiplying a district's cost per pupil from the previous year (plus an "allowable growth" factor --explained below) times the district's weighted enrollment. Weighted enrollment is a key factor in special education funding and will be discussed in greater depth below. For now, understand that handicapped students are weighted according to the degree of services they require above what is ordinarily provided to nonhandicapped students. In effect, a district's weighted enrollment inflates its actual student enrollment (head count), thus generating additional dollars for special education instructional services.

Cost per pupil is calculated as the sum of the previous year's cost per pupil amount plus a percent growth factor, "allowable growth," which is set by the state and based on the Consumer Price Index.[1] Once per pupil costs are calculated, they are multiplied by a district's weighted enrollment to establish the Controlled Budget level. Thus, next year's Controlled Budget for a district is last year's per pupil costs plus an allowable growth factor times this year's weighted enrollment. The allowable growth factor had risen to 13.6 percent by 1980-81 but was reduced to 5 percent by the state comptroller for the 1981-82 school year.[2]

The foundation level (refer to Figure 9) is the level to which the state will fund education. The legislation creating the funding scheme established this level at 77 percent of the state average per pupil costs. State aid to a district is based on the difference between the foundation level and the dollars generated through the uniform property tax. Districts are allowed to levy an additional property tax to make up the difference between the foundation level and the controlled budget level.

---

[1] Actually, allowable growth has been based on a different index in recent years. This is discussed in a later section.

[2] The reason for the downward adjustment and its impact will be discussed in later sections.

Funding Media, Educational, and Special Education Support Services

Total revenues for the REA's various services are generated in different ways and from different sources. The primary distinction is in the way special education instructional revenues are generated compared to the ways the other services, including special education support services, are generated. A further distinction can be made between the sources of special education support services revenues and those for media and educational services. This section deals with these latter distinctions, whereas the next section is devoted exclusively to special education instructional services revenues.

The ways revenues are generated for media, education services, and special education support services are similar in that they are based on a flat charge per pupil. However, the sources of the revenues (i.e., who pays the flat charge) are different. Media and educational services are charged directly to districts, whereas special education support services are paid for through a combination of state aid and property taxes, in the same proportional mix as the state and local contributions to general education funding.

Media Services

Revenues for media services are based on a fixed cost per pupil times the total REA enrollment (public and nonpublic). The current rate is $16 per pupil on a statewide basis, although the amount varies somewhat among REAs. The $16 figure has risen from a level set in the original legislation of $8 per pupil. As services and costs increased, the rate rose and, finally, in 1978, the costs of media services were allowed to increase each year at the rate of allowable growth established for the state aid foundation plan. The source of revenue for media services is the property taxes collected by each district. Thus, media services are paid for by local citizens exclusively.

Educational Services

Revenues for educational services are generated in the same manner as those for media services; public and nonpublic school enrollment is counted in the overall enrollment figure. The current rate for educational services is $21 per child on a statewide basis, with less than 1 dollar variance across REAs. Like the rate for media services, the educational services rate increases at the state rate of allowable growth. Here, too, educational services costs are paid for by local citizens via the uniform property tax.

Special Education Support Services

Although the support services revenue generating scheme is similar to that used for media and educational services, there are several fundamental differences. First, funds for support services are drawn from the state aid formula. That is, when the state calculates the state average per pupil cost from which it calculates the foundation level, the state average per pupil cost for support services is included. Therefore, special education support services are funded through a combination of state aid and local property taxes in the same proportional mix as state aid and local taxes are used to fund general education. The state assumes responsibility for support services costs in proportion to its share of general education costs.

Second, although support services costs are based on a flat charge per pupil like media and educational services costs, the way student enrollment is figured is different. Student enrollment used to generate support services revenues is based on the total weighted public school enrollment for the entire REA catchment area. Remember that the weighted enrollment is an inflated enrollment figure based on weights assigned to handicapped students according to the degree of services they need. On a statewide basis, the 1981-82 average rate per pupil for special education support services is $88, which increases each year based on the allowable growth factor. The Midland REA's support services allotment is a little over $92 this year.

Another important distinction between the way media and educational services revenues are generated and the way support services revenues are generated has become moot in recent years, but it is interesting from a developmental perspective. Originally, the legislature provided additional funds for support services (beyond allowable growth) for "new and expanded programs." REA support service costs were allowed to increase beyond allowable growth for a five-year period. Each REA could submit plans and budgets for new or expanded services beyond the level of allowable growth. This was logical and necessary in the early years of the REA as they expanded to full service capacity. However, as state funds became more scarce and, more importantly, as LEA budgets decreased because of declining enrollments and the REA budgets increased because of support services budgets that could grow at an increased rate, local districts and, in turn, legislators became dissatisfied with the system and it was subsequently changed. In fact, the "new and expanded services" dollars were discontinued after three years of the planned five-year period. Currently, special education support services budgets are tied to enrollment (weighted) and allowed to grow only by the allowable growth factor.

There is currently a great deal of concern over the manner in which special education support services are funded. The concern centers on two aspects of the revenue generating scheme: the assumption that per pupil support services costs are relatively constant across REAs and the wisdom of basing support services costs on enrollment, particularly in a declining enrollment situation.

The debate revolves around two issues. First, some directors of special education argue that support service needs cannot be assumed to be the same across REAs. They point to greater numbers of handicapped students, concentrations of more severely handicapped students, total nonpublic school enrollment, economic factors, population density, dropout rate, rate of absenteeism, and general achievement level as contributing to disproportionate needs across REAs. Secondly, reduced enrollments do not necessarily correspond to reductions in the need for support services. This is particularly troublesome for rural REAs where sparcity is a factor and results in children receiving fewer services than they need because of additional travel demands placed upon fewer support staff. Travel or "windshield time" is, of course, subtracted from direct service time.

While no definitive answer to the disproportionality of needs issue is available, a state study of the problem has shown that two factors may be indicative of unequal needs: square miles covered per support staff member and nonpublic school enrollment. Although the latter factor is not a major concern to the Midland REA since it serves only 4 percent of the state nonpublic school enrollment (compared to other REAs that serve much larger proportions, ranging up to 21 percent), the sparcity factor is a concern.

The Midland REA ranks second among the REAs in terms of sparcity; it serves 6 students per square mile with each support staff member averaging 57 square miles of coverage (the state average is 11 students per square mile and 31 square miles of coverage). In fact, the combination of a reduced allowable growth factor for 1981-82 and the state's fastest declining enrollment caused the reduction in Midland support staff (seven positions) discussed earlier. Even though the reduction in force did not seriously affect support service delivery this time because all but one of the positions were unfilled, further drops in Midland enrollment and continuance of the policy of alloting support service revenues on the basis of enrollment are likely to have adverse effects on the delivery of support services in the future.

Flow-Through Dollars

The revenues to support media, educational, and special education support services "flow-through" the local districts' budgets. That is, the amount of money the REA generates to support its operation simply appears in the local budgets of each district because it is generated on the basis of the enrollment of each district in the area it serves. One must understand that this money does not belong to the LEA; it belongs to the REA and would not be available to the LEA in any event. From a bookkeeping standpoint, the money does not pass from the LEAs to the REA; rather, it comes to the REA directly from the state on a quarterly basis. And whereas this may sound simple and quite logical, it is one of the REA's biggest problems; the districts' perception has been that the REA is taking their revenues.

The problem was particularly bad when the REA special education support services budget was growing beyond the allowable growth factor and LEA budgets, over the same period, were shrinking because of declining enrollments. Moreover, it was mostly because of this faulty perception of the REA as the "rich new kid" on the education scene and the reaction of the LEAs, who watched their budgets shrink, that caused the legislature to curtail support services growth by basing it, like general education funding, on student enrollment.

Educating the public and, particularly, the LEAs about this fiscal quirk has been and continues to be a major activity for the REAs, including the Midland agency. Although these public relations efforts have paid off to a degree, particularly with superintendents, the issue remains as a "bone of contention" in the minds of local school boards and community members. In fact, it threatens the very survival of the REA system and has had particularly negative effects on the perceptions of special education services (because so many dollars are generated) and educational services (because they are so amorphous). Media services seem to have escaped these negative perceptions because of their visibility and tangibility. Reactions of the LEAs range from elimination of the funding for these services to transfer of the funds to local control. What is alarming with respect to special education services is that a "backlash" of sorts is beginning to be voiced. Local district constituents are beginning to resent the amount of resources they see being spent on special education; remember, the Midland REA is special education to them.

The saddest thing, of course, is that this perception of the REA as somehow taking from LEAs (or getting something that the LEAs aren't getting) is a false one which derives from a lack of understanding of the REA concept and its goal to improve educational services on an area basis by equalizing services to all children. Moreover, these issues most likely would not have developed if the growth period of the REAs had not coincided with restrictions on LEA budgets. And even though the recent fiscal restrictions placed on the REAs by the legislature may alleviate some LEA concerns (by no means at no cost to the quality and/or extent of services), the flow-through funding procedure remains as an irritant to many local school boards and administrators. The State Association of School Administrators has studied the problem and suggested that the procedure be changed. Of course, one solution to the problem would be to give REAs taxing authority.

The success of the REA concept and the special education mandate is predicated on the availability of ample resources with which to comply. Ironically, it is this very thing, availability of resources, that now threatens the REA network and the special education mandate. Some positive gains have been made lately, however. The REA has worked hard to educate district superintendents about the flow-through issue and the superintendents, in turn, have worked to enlighten local school boards. The superintendents who have been won over have taken the case to their school boards by explaining the flow-through mechanism to the board, detailing the procedure and its purpose, and making the point that the regional agencies use the flow-through dollars to help small schools survive. As a result of such efforts, the general feeling is that resentment has lessened to a degree, but that further effort is needed to reach more people with the message, particularly in the smallest Heartland districts.

Funding REA and LEA Special Education Instructional Programs

Revenues for special education instructional programs are generated and distributed differently than the dollars for special education support services. To understand the system, one must be familiar with, among others, two key ideas: weighting and tuition.

Weighting Plan

Special education instructional programs are developed along a "continuum of services" model. The continuum ranges from the least restrictive placement options such as supplemental assistance (special adaptations which allow the student to remain full-time in a regular classroom) and resource room program (student attends regular classes nearly all day and receives additional help in a resource setting) to the most restrictive setting which is a self-contained special program in which the student receives his total program in a separate classroom, building and, in the most severe cases, possibly a residential facility in the region, state, or in another state.

The placement of a child in any program is determined more by the severity of the handicapping condition and, thus, the level of services required, than the type of disability itself. For example, a learning disabled child may be assigned to a regular class plus resource room assistance, or a special class with integration into the regular program, or a self-contained class. The placement depends more upon the severity of the learning disability and the teacher-student ratio necessary to provide appropriate instruction than on the fact that the child has a learning disability per se.

Table 5 provides the weights assigned to different instructional placements, describes the programming criteria for each placement and indicates the student-teacher ratio. The weighting plan is integrated into the total educational finance system, the School Foundation Plan. As such, the "excess costs" (above the costs of instruction in the regular program) for special education instruction are borne by both the state and the local district in the same proportional mix as general education financing which is based on local wealth. A district's cost per pupil (prior year's cost per pupil plus allowable growth) becomes the 1.0 weight of regular students and, thus, determines the funds generated for excess special education instructional costs.

A student identified as requiring special education is assigned a weight of 1.7, 2.0, or 4.0 and, therefore, generates special education dollars at the weight times the district per pupil cost. Students who are enrolled in the district on December 1 of one year make up the special education student enrollment count, which is used to generate the district's special education instructional budget for the following year. Multiplying the total of the weights for all handicapped students counted on December 1 by the district's cost per pupil (last year's cost per pupil plus allowable growth) yields the district's special education budget for the next year.

School districts account for the total dollars generated via the weighting plan in a separate special education budget. This includes the 1.0 funds, the equivalent of the amount generated by regular education students. However, an accounting mechanism is used to transfer the 1.0 funds, or a portion of those funds, back into the regular program budget. These monies are used then to cover the costs of regular transportation (not specialized), operation and maintenance, administration, and integration costs, which are costs incurred by the regular program

Table 5

Placement Options, Weights, and Maximum Class Size

Placement Type	Weight	Criteria	Maximum Number of Students Per Teacher
Supplemental Assistance	1.7	Regular educational program with supportive programs, services, materials, equipment, and/or transportation.	10
Resource Teaching Program	1.7	Regular education program in addition to special education resource teaching program.	18
Special Class with Integration	1.7	Special education class with integration in the regular education program.	12 (elementary)[1] 15 (secondary)
Self-Contained Class	2.0	Self-contained special education class for moderately handicapped students.	8 (preschool) 8 (elementary) 10 (secondary)
Self-Contained Class	4.0	Self-contained special education class for severely handicapped students.	5
Special Day School/ Residential Facility	4.0	Special day school, boarding school, or residential facility.	--

[1] Programs for hearing impaired students have a maximum of 10 students per teacher.

when the student is integrated into regular classes. Table 6 shows the portion of the 1.0 costs that are returned to the regular program by special program type.

Using the 1981-82 state average per pupil costs of $1,940, Table 7 provides an example of the regular program flow-back funds.

Tuition

Once a district has generated its special education budget, it has four options for providing special education instructional services according to the specifications that accompany each weighted program type: provide the program itself, send the student to a program operated by another LEA[1], send the student to a program operated by the REA, or send the student to a program operated by another public or private agency.

For the last three options, the district must pay tuition for the student to attend a program operated by another agency. Tuition is calculated by dividing the real costs of the program by the number of students it serves. No matter which option is selected, the money generated by the student's weighting is used to cover the costs of providing the program. The Heartland REA central administrative office provides the accounting services necessary to transfer tuition dollars from LEAs to the REA. Districts transfer tuition dollars for LEA programs on their own.

Special Education Funding Adjustments

As one might imagine, there are a number of circumstances which might occur for any given LEA that would send the weighting scheme into a tail spin; a student requiring a special education program moves into the district after December 1, transportation costs overextend the budget, programs operate at less than capacity, and so on. To account for these and other situations which might require some sort of adjustments to be made, the state maintains the State Budget Review Committee (SBRC). The SBRC has two primary functions. First, it reviews all LEA special education budgets and provides a mechanism to make up deficits and adjust surpluses. Second, it reviews special education pupil and finance data and makes adjustments (up to .2) in the weightings on an annual basis.

Let us first describe how LEA special education budget deficits are handled. When the economy was in better shape, making up deficits was a simple matter. The state would give the district the money to cover the deficit in the form of additional state aid. Now that the economy has turned down, however, the state no longer has the resources to be so generous. In a deficit situation the SBRC now routinely grants the LEA permission to include additional allowable growth in its next year's budget. (The needed money is taken from the general education account and made up the following year through the adjustment in allowable

---

[1] The tuition option does not exist for the resource program type because of all LEAs provide their own resource rooms.

Table 6

Percent of Regular Program Costs Returned by Placement Type

Placement Type	Integration	Weight	Percent of 1.0 Costs Returned to Regular Program Budget
Supplemental Assistance	Total Integration	1.7	100
Resource Teaching Program	Considerable Integration	1.7	100
Special Class with Integration	Some Integration	1.7	45
Self-Contained Class	Little Integration	2.0	30
Self-Contained Class	No Integration	4.0	25

Table 7

Regular Program Flow Back Funds by Weights

Placement Type	1981-82 Per Pupil Costs	Weight	Total Dollars Generated (Weight x Cost Per Pupil)	Percent Flow Back of 1.0 Regular Costs	Dollars Flow Back to Regular Program	Special Program Dollars
Supplemental Assistance	$1,940	1.7	$3,298	100	$1,940	$1,358
Resource Teaching Program	$1,940	1.7	$3,298	100	$1,940	$1,358
Special Class with Integration	$1,940	1.7	$3,298	45	$ 873	$2,425
Self-Contained Class	$1,940	2.0	$3,880	30	$ 582	$3,298
Self-Contained Class	$1,940	4.0	$7,760	25	$ 485	$7,275

growth.) Naturally, this means that the district must increase the local tax levy to generate the dollars; this is not looked upon as an attractive course of action, as one might imagine. The SBRC and the DPI realize that this is not a workable solution for the long term. Ironically, most of the money needed to make up LEA special education budget deficits is available in the state but cannot be gathered up or used by the SBRC. The money exists in the form of special education budget surpluses in other LEAs.

The SBRC reviews the budgets each year of those LEAs showing a positive special education balance. The SBRC routinely allows these LEAs to apply balances over five percent to the subsequent year's special education budget. To do this, the LEA simply reduces the local tax levy for the following year and the SBRC reduces the state aid amount proportionately. The SBRC permits LEAs to keep balances of five percent or less and apply them to the next year's special education budget without a concomitant adjustment in state aid or property taxes. Either situation works to the advantage of the LEA with a special education budget surplus. The problem with this arrangement is that the SBRC cannot recoup the excess funds from these districts; it can only allow them to apply those funds to next year's special education budget in one of the two ways described above. If the SBRC could recoup the state aid portion of those surplus funds, it could create a fund to be used to cover the costs of LEAs which ended the year with a special education deficit. In fact, the SBRC has approved a plan and submitted it to the state legislature which would, in effect, zero out all LEA special education budgets at the end of each year. If approved, the plan would eliminate situations in which some LEAs show a surplus at the end of the year while others are caught short. It is pending currently.

In addition to dealing with LEA special education budget deficits and surpluses, the SBRC is responsible for reviewing and, if necessary, adjusting the weights assigned to various special education program types. Based on real cost data for the state, the SBRC has the authority to adjust any of the weights by a .2 increment and has done so on several occasions since 1975-76. The original weights were set at 1.8, 2.2, and 4.4. Between 1975-76 and 1981-82, the 1.8 was reduced to its current 1.7; the 2.2 weight was reduced to its current 2.0; and the original 4.4 weight was reduced twice, from 4.4 to 4.2 and then again from 4.2 to its current 4.0 level. The weights for 1982-83 and 1983-84 have been announced: 1.7, 2.2, and 3.8, and 1.7, 2.2, and 3.6, respectively.

Thus, we see that this state's version of the pupil weighting system addresses adequately some of the major disadvantages of the general weighting system approach. In fact, state officials are very proud of the entire special education funding system; and, indeed, they have every right to beam. Table 8 compares special education instructional costs between 1975-76 (the start of the REA delivery system) and last year's total instructional program expenditures and expenditures by program type.

The DPI was quick to point out to the state legislature that, although total costs increased over this period because of a 72.8 percent increase in the number of students served and unprecedented inflation,

Table 8

Comparison of 1975-76 and 1980-81 Instructional Costs Per Pupil

Placement Type	1975-76 Costs	1980-81 Costs	1980-81 Adjusted Costs[1]
Resource Teaching Program	2,165	2,836	1,815
Self-Contained with Integration	1,786	2,760	1,766
Self-Contained Class	2,253	3,754	2,402
Preschool Class	3,914	3,456	2,211
Self-Contained Class	3,167	6,133	3,924
Total Per Pupil	2,147	3,086	1,975
TOTAL EXPENDITURES	59,013,892	146,554,091[2]	93,782,614[3]

[1] Adjusted for inflation to 1975-76 dollars.

[2] 72.8 percent increase in pupils served.

[3] 58.9 percent increase in buying power of dollars.

the REA system has been very cost-effective in that it has been able to serve students for less cost per pupil in virtually every program category when 1980-81 dollars are adjusted for inflation. Needless to say, the legislature was impressed; these figures represent a 58.9 percent increase in the buying power of the dollars they had allocated for special education.

Another feature of the special education funding system (instructional dollars only) that pleases the DPI and the legislature is the accuracy with which total costs are predicted. For example, total statewide expenditures for 1981-82 were 2.2 percent below the $161 million allocated under the weighting scheme, an impressive accounting feat. That suits the legislature particularly well since it operates under a mandated balanced budget.

One should not assume that these accomplishments have made state officials blind to the remaining funding problems. Indeed, they are painfully aware of the fact that special education budgets at the LEA level less often balance out as well as the state's budget. The DPI continues to make proposals to the legislature which it believes will remedy the situation for the locals.

P.L. 94-142 Special Education Funds

As prescribed in P.L. 94-142, the state education agency receives the entitlement based on the state-wide child count, keeps 25 percent, and passes the remaining 75 to the LEAs via the REAs. The money passes from the state to the locals through the REAs because each REA submits a consolidated application[1] on behalf of itself and its member LEAs. Remember, the state views each REA as the special education program, encompassing all REA programs as well as those of the member LEAs. Thus, the state's fiscal management of P.L. 94-142 monies is quite simple; funds are distributed to the 15 REAs on the basis of their respective handicapped child counts. The REAs then, under ordinary circumstances, would pass funds on to its member LEAs. However, the circumstances in this state are extraordinary when it comes to what P.L. 94-142 monies are used for.

State Entitlement. The Special Education Division of the DPI maintained 25 percent of the 1981-82 P.L. 94-142 dollars, or $3.13 million, to fund three aspects of overall special education operation: direct administrative costs, costs of providing program support and technical assistance to local and intermediate education agencies, and costs of instructional and support services for children who are served in programs that the state operates on a regional or statewide basis.

The total P.L. 94-142 dollars received by the state in 1981-82 was $13.3 million. This amounts to 5.8 percent of the total state special education costs for support services ($56.5 million), special education instructional programs ($74.5 million), and the regular education portion (the 1.0 weight) of the costs associated with providing special education programming ($86.5 million)--a total state cost of $217.5 million. If only excess costs (above regular education costs) are considered ($56.5 million plus $74.5 million or $131 million), P.L. 94-142 revenues, at $13.3 million, amount to 10.2 percent of the total.

---

[1] An application submitted for P.L. 94-142 funds by more than one education agency.

REA Entitlement. In its application to the federal government for P.L. 94-142 funds, the DPI assures that the monies will not be co-mingled with state special education dollars, that they will be used to supplement and increase state and local funds expended for special education and that they will not be used to supplant state and local special education dollars. Because SF 2001 created a statewide special education delivery system and the fiscal resources to sustain it prior to P.L. 94-142, the state earmarked the P.L. 94-142 dollars to supplement and increase the preschool handicapped programs offered in each REA. State dollars for special education instructional and support programs are generated on the basis of a weighted student enrollment procedure. Thus, in order to generate dollars, a handicapped child must be enrolled in school. Children who are age five and younger are not ordinarily enrolled in school and, therefore, do not generate resources to support their education under the weighting scheme. Under the P.L. 94-142 "supplement not supplant" provision, the state had to use the federal dollars for programs they were not already providing. Since SF 2001 generated resources for all children except those too young to be enrolled in school, the P.L. 94-142 monies naturally are used to provide early childhood education and the necessary support services.

Thus, we find a situation in which a state provides all services required by P.L. 94-142 without the use of P.L. 94-142 dollars and, more importantly, uses those dollars to go beyond the law to serve a population that is generally not provided for in it. All in all, a very fortuitous situation for young handicapped children and their parents in this state. And, as we shall see, the benefits that accrue are very impressive--for the youngsters, their parents, the community, and the schools.

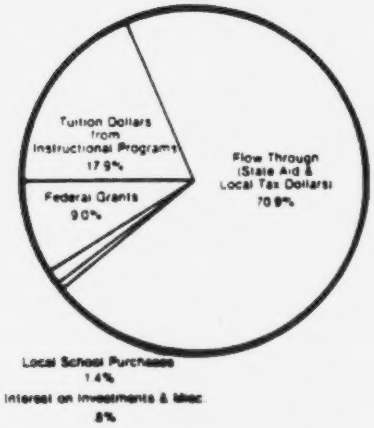
REA Revenues and Expenditures

Given the above description of the system used to generate and distribute dollars for media services, educational services, and special education instructional and support services, this section presents the breakdown of revenues generated by the Midland REA during the 1981-82 school year. Because Midland expenditures were presented much earlier in the story, they will be briefly recapitulated here so that revenues and expenditures can be compared side by side.

Total REA Revenues and Expenditures. Figure 10 lists the revenues and expenditures for the total Midland REA operation. You will recall from earlier discussion that "tuition dollars" are paid by LEAs to the REA for providing requested special education instructional programs and that "flow-through" dollars are funds generated on the basis of student enrollment which are used to provide special education support services and media and education services. The revenue figure for "federal grants"

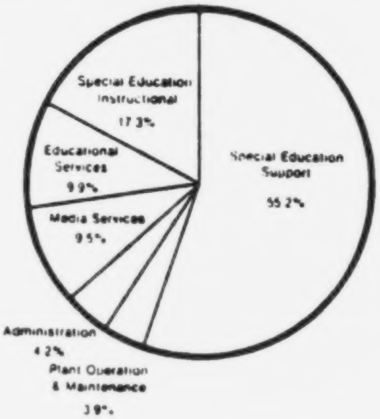
Figure 10

Revenues by Sources/Expenditures by Program Costs



PROGRAM REVENUES

Tuition Dollars from Instructional Programs	1,069,138
Flow Through (State & Local Tax Dollars)	4,236,373
Federal Grants	538,085
Local School Purchases	84,815
Interest on Investments & Misc.	47,499
TOTAL	$5,975,910



DIRECT PROGRAM COSTS

Special Education Support	3,102,044
Special Education Instructional	968,555
Educational Services	558,931
Media Services	535,136
Administration	238,615
Plant Operation & Maintenance	219,755
TOTAL	$5,623,037

BEST COPY AVAILABLE

includes the P.L. 94-142 dollars passed from the DPI to the REA to support preschool programs. The pie graphs for total revenues and total direct program costs per division provide a further illustration of the extent to which special education dominates REA operations.

A small proportion of the budget surplus of $352,873 (6 percent) represents outstanding purchases. Most of the surplus, however, represents excess special education support service dollars which resulted from the inability of the REA to fill some support positions. The state recently has paid close attention to support services budget balances. There is talk among the REA directors of special education that the state may attempt to recapture these dollars. Currently, the REA can carry these funds over into the next budget year.

The total amount of money spent for instructional programs by the Midland REA is only a fraction of the total of instructional dollars spent by the entire Midland area. Table 9 indicates the total number of dollars spent by the Midland LEAs for instructional programs, as well as a breakdown by program types. Additionally, the table provides an indication of the proportion of students in each program type who are served by their home LEA versus those who are "tuitioned out" to other LEAs, the REA, or to other agencies. Calculating the proportion of total Midland instructional dollars allocated to LEAs versus the REA indicates that the REA receives only 11 percent of the instructional dollars. The proportion of students served in instructional programs offered by the REA is even less since the REA tends to serve low incidence, higher weighted student populations.

Table 9

Midland Area Special Education Instructional Dollars Generated 1981-82

Placement Type	Weight	Number of Students			Total Students and Expenditures[2]	
		Home LEA	Tuitioned Out	Total	Total Dollars	Students
Supplemental Assistance	1.7	15	0	15	47,030	14
Resource Teaching Program	1.7	1,677	9	1,686	5,699,079	1,673
Special Class with Integration	1.7	336	129	465	1,426,918	423
Self-Contained Class	2.0	63	124	187	663,300	165
Preschool[1] Handicap	2.0	9	64	73	260,034	66
Preschool Handicap	4.0	5	28	33	264,819	34
Self-Contained Class	4.0	30	143	173	1,331,172	169
Total		2,135	497	2,632	9,692,352	2,544

[1] Preschool 2.0 and 4.0 paid for with P.L. 94-142 dollars.

[2] Total students enrolled by December 1, 1981.

AUTHORITY AND RESPONSIBILITY FOR SPECIAL EDUCATION

Since the passage of P.L. 94-142, most states have amended existing state laws or created new ones to assure compliance with the federal statute. Such was not the case in this state, however. As we have noted in previous sections, the state special education law here existed prior to the passage of P.L. 94-142 in 1975. Not one word of the state law has been changed as a result of P.L. 94-142. There was no need to do so.

P.L. 94-142 and Chapter 300

You will recall that Chapter 300 is one part of SF 2001, the "package deal" legislation which created the REAs. For all intents and purposes, Chapter 300 and P.L. 94-142 espouse the same principles and guarantee the same rights to handicapped children and their parents. The two laws are so similar because they share a common foundation; they both are based on the model law written by the Council for Exceptional Children, the national professional organization of special educators. The two laws differ in one respect, however. While P.L. 94-142 guarantees a free appropriate public education for handicapped children ages 5 to 21, Chapter 300 extends the age limits downward to birth.

By the time P.L. 94-142 came down from Washington, the DPI had already begun implementing Chapter 300. The biggest impact of P.L. 94-142 was that it reaffirmed the state special education law in the minds of those who doubted it. The REA concept is considered to be the special education mandate.

Authority and Responsibility

The DPI is given responsibility for all education programs provided for handicapped children in the state through Chapter 300, an additional statute giving the DPI supervising responsibility over nonpublic schools and over educational programs existing in facilities operated by the Department of Social Services and an interagency agreement with the State Board of Regents. Authority and responsibility is delegated to the Division of Special Education within the DPI to promote, direct, and supervise the education of handicapped children in all schools under the control of the DPI.

Through Chapter 300, the Division of Special Education extends that responsibility to the REA directors of special education who coordinate the special education program in each REA area.

Consolidated Applications

To receive its fiscal entitlement under P.L. 94-142, the state makes application to the federal government and assures compliance with P.L. 94-142. Each REA submits one consolidated application to the state on behalf of itself and its member LEAs. The consolidated application process makes REAs and their LEAs partners in the provision of special education services and programs; they are in it together.

Compliance Monitoring

The responsibility for monitoring compliance is assigned, by Chapter 300, to the DPI, Division of Special Education. It is more than interesting to note that the language describing monitoring in the state application goes beyond statutory compliance to include "program effectiveness." Through reviews of consolidated applications and on-site visits, the state monitors and evaluates special education programs and services to determine "if the program or service is adequate and proper to meet the needs of the child; if the child is benefiting from the program or service; if the costs are in proportion to the educational benefits being received; and if there are any improvements that can be made in the program or service." A written report of the evaluation is sent to the REA, the LEAs, and to the president of the senate and speaker of the house of representatives of the general assembly.

Midland Special Education Policy

The Midland REA translates state special education rules and regulations into its "Special Education Procedures Manual," which is referred to locally as "The Book." The body of the manual is printed sideways on about 80 8½ X 11 pages, each divided into three columns. In the left-hand column are printed the state special education rules and regulations; the middle column specifies the Heartland procedures which correspond to each rule and regulation; the last column is reserved for comments and further clarifications. If one were searching for a catchy name for the procedures manual, a fitting choice would be "Everything You Ever Wanted to Know About Midland Special Education," although "The Book" probably says it best.

The director uses the three-column format for a very specific reason. Early on, he and the REA were perceived by the LEAs as "making the rules" for special education. He uses the three-column format to show the LEAs that the "procedures" required by the REA do in fact correspond to the state special education rules and regulations.

IDENTIFYING AND PLACING STUDENTS

Naturally, the first step in providing special education services is to find the students who are eligible for those services and to decide which services they need. The following sections take us through this process. Once we know how students are identified and placed, we can begin to discuss how services and programs are delivered by the REA and the local districts.

Processing Students

The process depicted in Figure 11 represents the steps followed from the point a referral is made to the development an Individual Education Plan (IEP) which specifies the nature of the disability and the measures to be taken to deal with it.

Screening and Identification

There is very little doubt as to the impact the REAs and P.L. 94-142 have had on the number of children identified and served; a statewide increase of 78.2 percent fits well with estimates that the joint county system was serving only about 25 percent of all handicapped children. What is less clear is whether this increase was due to P.L. 94-142 or the REA system. Given the requirements of the SF 2001 package, it seems safe to say that the increase would have been obtained regardless of P.L. 94-142. However, one must remember the role the federal law played in reaffirming the state mandate, let alone how it was used to support preschool handicapped programs.

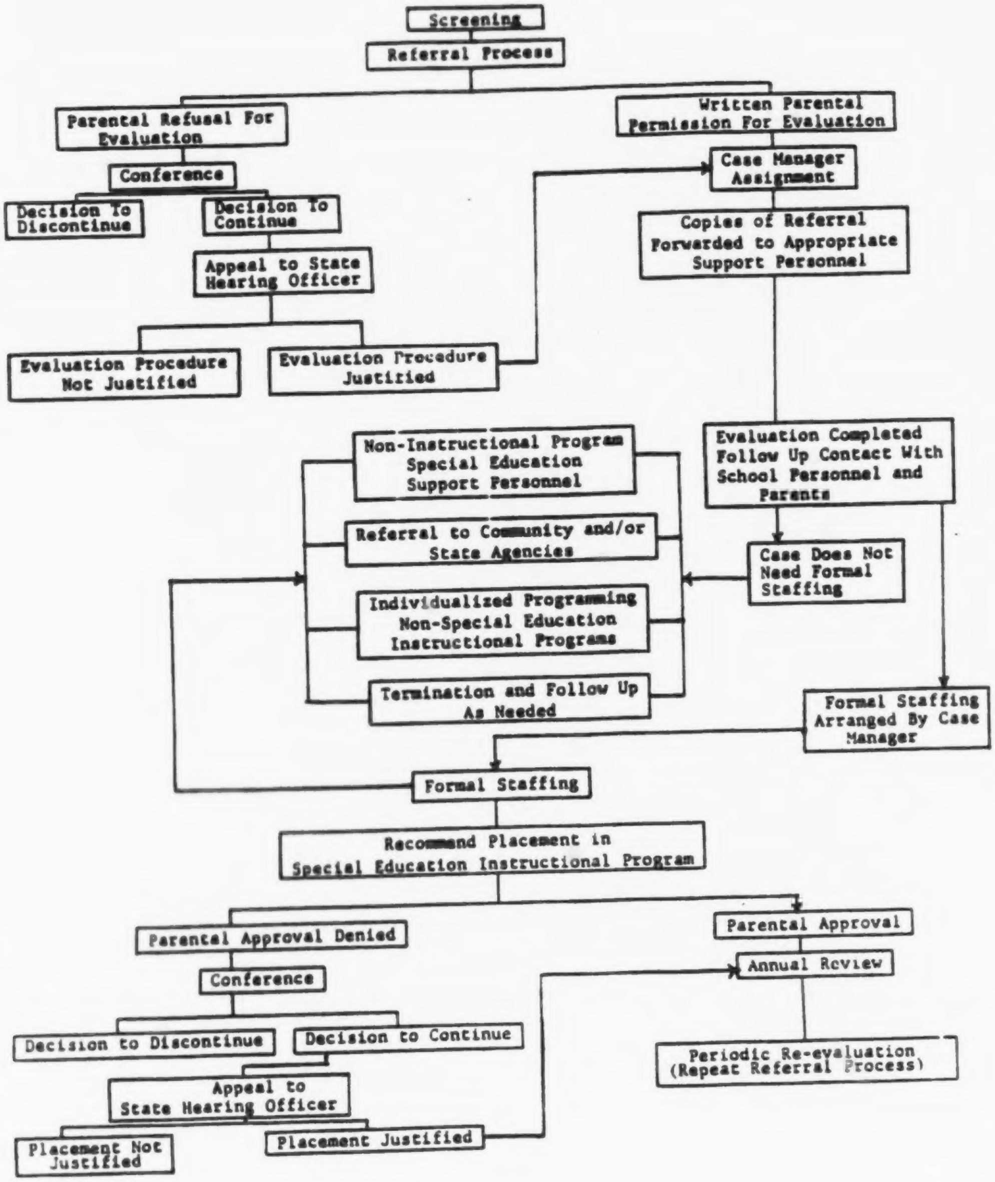
The statewide system of child identification carried out each year cooperatively by the state, the REAs, and local districts consists of a public awareness campaign, a series of screening and referral activities, and a computerized child accounting system. Each REA conducts a local informational program, which corresponds to a statewide media campaign, and notifies parents where they may bring their children to have them assessed. The state TV and radio spots feature the state superintendent who encourages parents to have their children screened by contacting their local REA.

The Midland REA presents slide/tape shows and other informational programs to various community and parent groups. Parents are directed to bring their children to their local "pre-kindergarten roundup" or "well child clinic" (run by local health departments) to have any suspected problem checked out.

Of course, the target populations here are very young children and children who may have severe handicaps or handicaps that are not easily identified (e.g., hearing impairments). Besides parents, other professions and agencies make referrals, too. And, although the cooperation among the REA, Public Health, and the Department of Social Services is very good in this regard, relations with area physicians have been a good deal less productive. Although there is a good deal of variance among area physicians, most parents and REA staff members characterize them as unaware of the potential of early childhood intervention and the

Figure 11

Flow Chart for Referral and Special Education Services


Screening
Referral Process
Parental Refusal For Evaluation
Written Parental Permission For Evaluation
Conference
Case Manager Assignment
Decision To Discontinue
Decision To Continue
Copies of Referral Forwarded to Appropriate Support Personnel
Appeal to State Hearing Officer
Evaluation Procedure Not Justified
Evaluation Procedure Justified
Non-Instructional Program Special Education Support Personnel
Evaluation Completed Follow Up Contact With School Personnel and Parents
Referral to Community and/or State Agencies
Case Does Not Need Formal Staffing
Individualized Programming Non-Special Education Instructional Programs
Termination and Follow Up As Needed
Formal Staffing Arranged By Case Manager
Formal Staffing
Recommend Placement in Special Education Instructional Program
Parental Approval Denied
Parental Approval
Conference
Annual Review
Decision to Discontinue
Decision to Continue
Periodic Re-evaluation (Repeat Referral Process)
Appeal to State Hearing Officer
Placement Not Justified
Placement Justified

needs of young handicapped children. In the more extreme cases, physicians are thought to view the REA as a threat. Some physicians make referrals to the state university training hospital (which maintains its own educational facilities for severely handicapped children). In turn, the training hospital refers virtually all Midland children back to the REA. Of late, however, the REA has been able to win over some physicians through impressive gains in children the physicians had formerly discounted. Apart from this rift with physicians, in general, one can assume that all referrals are ultimately channeled into the REA in some fashion.

The system has been very effective in identifying young and/or previously unidentified handicapped children in the state and region. However, there are those who believe that there are still some (very few) "hidden children" out there. Some parents, evidently, cannot be reached, either by public campaigns, the REA, or the twentieth century.

State regulations require that the public schools find and serve handicapped children from birth on. However, these same regulations require parents to accept services only for children who are seven and older. In effect, parents cannot be forced to allow their children to be served before the age of seven. The local districts and the REA do have one option, however; they can file neglect charges against parents who refuse to allow their children under seven to be served. And although this course of action has never been taken in the Midland area, the REA is ready to exercise it in cases where the child is severely handicapped. For parents who refuse services for their young mildly handicapped children, the unofficial policy from the DPI is to not file neglect charges because of the fear that parents will become alienated and resent or fear special education services later when the child reaches the age of seven, at which time the P.L. 94-142 due process mechanism can be brought to bear.

Not all parents who refuse services can be considered to be neglecting their children, however. There are parents who provide their own interventions for their children, and do it well. Naturally the REA is there to help these parents with consultation and materials.

In-School Referral

The diagram depicted in Figure 11 illustrates the flow of the referral process. When a referral is made, the building principal obtains written permission from parents for an evaluation. A case manager is assigned based on the problem identified in the referral. Case managers are typically REA support staff determined by the suspected disability and the speciality needed.

Although referrals can come from LEA or REA staff, parents, physicians, community or state agencies, or the child him or herself, most in-school referrals originate with regular classroom teachers. Some administrators feel that teachers are too quick to refer students for special services and that there is a tendency to refer students who otherwise would have been served adequately in the regular classoom if it were not for the availability of so many special programs ("If you have a program, they'll send kids."). Some feel that teachers use special education as a means "to get rid of problems." However, those who may be a little closer to the situation, special education resource teachers, for example, tend to defend the regular teachers, in that they feel classroom teachers are concerned about these students but for one reason or another would rather have someone else address the problem.

One should not assume, however, that all referrals end in a "handicapped" determination. Indeed, 70 percent do not. And, even though Figure 11 illustrates the mechanism for addressing the problems that may have prompted the referral in the first place (psychologists and special education consultants offer suggestions to teachers for these students), it is difficult for teachers to accept the situation in which the student they referred is declared ineligible. It's even more difficult when the report is that there is nothing wrong at all.

What concerns some people more than over-referral is the under-referral of the "quiet kid" who, although he may need help, does not squeak loudly enough to get oiled. Further, other children end up being referred less often than some observers feel is appropriate. Children from lower socioeconomic groups sometimes are not referred by teachers because they are perceived to be undermotivated rather than "handicapped." Principals are sometimes reluctant to refer students for whom no services exist in the building or district.[1]

Not along ago, the time from referral to staffing ranged from 2 to 3 weeks to 2 to 3 months. This is not hard to imagine in an area as large as the Midland catchment area. However, the REA went to work on the problem and has developed a system which has reduced the lag time considerably.

Referral Management System

A number of referral management teams made up of special education consultants and support personnel have been established. Each team serves a number of districts. They meet weekly (at times, using conference calls) to review the referrals that have come in that week and to assign a case manager. A team leader is in charge and makes sure each referral is dealt with expeditiously. Even with the new management system, however, delays still occur in some cases.

Pre-Staffings

Another efficiency measure has been instituted to streamline the completion of evaluations that must be conducted prior to the actual staffing.[1] Parents do not necessarily attend these pre-staffings, but they are notified of "the purpose, time, and location of the meeting and who will be in attendance" by the building principal.

---

[1] More will be said about this later in the section "Heartland Special Education Instructional Programs."

The purpose of the pre-staffing is to arrange for and monitor the evaluations that must be conducted in preparation for the actual staffing. These sessions include the support personnel involved in the case; the REA director of special education, usually represented by the management team's special education consultant; the building principal; and other LEA personnel determined by the principal. In conducting these sessions, the staff are not to make any pre-judgements regarding the placement of the child since parents must be in attendance for those discussions.[2] However, the teams are not totally successful in withholding judgments. After all, these are professionals who have been trained to make such observations. It is not surprising in the least that occasionally a placement option surfaces in the discussion. If this does happen, parents are notified of any and all options discussed. When the case manager feels that the necessary evidence has been gathered, he or she arranges the formal staffing conference.

Staffing Conference

In general, the conference is attended by LEA personnel, REA personnel, the parent(s), and the student if he is 18 years of age or is mature enough to benefit from the experience (about 10 percent of the students attend their IEP conference and for most it is a valuable experience). Because the building principal is technically the supervisor of special education in his or her building, he/she (or a designee) is required to chair the conference, and the special education consultant assigned to the geographic area attends all staffings as the official designee of the REA director of special education. In some cases the principal asks the REA consultant to serve as his or her official designee. Other REA staff, particularly the support staff who have conducted evaluations, also attend. Additional members are the LEA special and regular education (ordinarily the referring teacher) staff who have been involved in the case.

If one were tallying conference membership, he is likely to have run out of fingers by now. The number of people in the staffing conference has been a problem in the past, often amounting to over a dozen professionals. There was concern that some parents were overwhelmed and that such a large group had a negative effect on the proceedings. Steps have been taken to limit the number to five members whenever possible. Each person in attendance is assigned a role: the psychologist reports the results of psychological tests, other support services staff who may have been involved in the case report their findings, the special education consultant reports results from classroom observations, the referring regular teacher reviews the reason for the referral and reports on the student's current regular class performance, the special education teacher shares the results of academic or diagnostic testing that may have been conducted, and the parent is expected to provide information on the child's performance at home and goals for programming.

---

[1] A "staffing" refers to a meeting between parents and school personnel where student data are presented and discussed and a special education program is an option. Also called an IEP Conference, since the IEP is developed at the meeting.

[2] There are certain conditions under which placement decisions can be made without the parent.

After permission to test has been secured and prior to the staffing, some districts send parents an attractive booklet prepared by the REA that explains the staffing conference. It is intended to prepare them for the conference by explaining its purposes and procedures, identifying the types of matters that will be addressed, and projecting events that will occur after it. There is a section on explaining the conference to the child and suggested lists of information to bring and of questions to ask. The last several pages provide space to make these lists and to take notes during the staffing. At several places, the booklet stresses that the staffing conference is a team endeavor and that the parent is considered a member of the staffing team.

Parent participation in staffing conferences varies according to the LEA, the particular handicapping condition, the degree of severity of the handicap, socioeconomic status, parent's educational background, the amount of experience the parents have had in such activities, and the nature of that experience. Most districts report active involvement. Estimates of parental attendance at initial staffing conferences range from 90 to 100 percent, with about 50 percent of the staffings attended by both parents. Annual review staffings also are well attended. Estimates here range from 80 to 90 percent. And although these attendance figures are impressive, the amount of actual meaningful participation by parents is somewhat less encouraging. Parents with minimal educational backgrounds feel that they have little to offer, but even those with more education feel uncomfortable about setting educational goals for their children. Some parents, particularly parents of educable mentally handicapped children, are themselves mentally handicapped. Estimates of the proportion of cases in which this is true range from 50 to 90 percent, depending on the district.

It appears that parents, regardless of their background, are intimidated by the process. One mother characterized the staffing process as one in which "six professionals sit you down and tell you what you did wrong with your child." And for most parents, repeated staffing experiences doesn't seem to help reduce their feelings of intimidation. Some parents feel intimidated because they sense that everything has been decided before the staffing takes place and that they have been invited simply to hear the results.

Meaningful parent participation is increasing, however. Those who do attend are more sophisticated, more aware, and they make more contributions. One should not assume, however, that the growth has been one-sided. At first, the LEA and REA staff were just as aprehensive as the parents they were trying to welcome to team membership. The staff feared that parents, with their newly gained rights, would take over and somehow control both the conference and the child's program. Although this perception may seem unwarranted, to say the least, given the level of participation described above, it is not without some basis in reality. There are most definitely parents in the Midland area who would give even the most seasoned professional a run for the money in a staffing conference. Fears of a "take over", however, have dissipated for the most part. It is interesting to note that as these fears on the part of professional staff have subsided, parent participation has increased. Of course, other factors such as holding conferences at more convenient times and reducing the number of professionals in attendance have contributed to increased participation as well. Two key players in setting the climate of the IEP conference are the consultant and the psychologist. Most consultants and psychologists receive high marks for understanding the parents' situation, being prepared, and creating a comfortable environment. And, whereas there is no evidence to suggest that other participants fall unacceptably short in these areas, it is certain that the consultant and/or the psychologist play an important part in setting the tone of the conference.

Now that we know who attends the IEP conference and what each person does, let us review briefly what actually happens at the conference. The following list summarizes the events that take place.

1. Prior to the staffing, the parents have been advised as to the nature and purpose of the staffing and who will attend.

2. At the time of staffing, the chairperson introduces the members of the staffing team.

3. The chairperson identifies the child's present program.

4. Each person who has conducted an evaluation is given a few minutes to summarize his/her findings and recommendations. Whereas, written summaries have been provided in some cases, it is anticipated that these oral reports will take only a few minutes. The psychologist is the last person to report, and concludes the report by giving a diagnosis.

5. The chairperson of the staffing committee or the designee of the Director of Special Education identifies the needs of the student being staffed. These needs are discussed and clarified with the parent and other participants in the staffing.

6. Goals are listed for the student.

7. Program options are identified and discussed with the parents. The most appropriate option is then selected.

Program and Placement Decisions

As indicated above, the final goal of the IEP conference is the selection of the most appropriate program for the child. It would be a mistake, however, to assume that each student is always placed in the most appropriate program. In some cases, the appropriate program and the actual placement are two different things. For a number of reasons that will be discussed in more depth in the next section, it is not always possible to place a student in the most appropriate program. In these cases a "rule exception" is proposed and considered by the Director of Special Education.

As prescribed in the rules and regulations accompanying Chapter 300, a copy of the staffing report and the request for a rule exception is forwarded to the director which explains the programming needs of the child; the justification for the request, including the unique circumstances which prevent the child from being placed in the most appropriate program; how the recommended placement will be adjusted (via instructional and support personnel utilization) to meet the needs of the child; and verification that the child's progress will be closely monitored. The director may approve the request, deny it, or send it to the DPI for an opinion. If granted, the rule exception is good for one year.

It should not be assumed that requests for rule exceptions are certain to be approved. Further, simply because a student is placed in a program other than the one recommended at the IEP conference does not mean that the placement is totally inappropriate. In fact, some of them turn out to be the placement of choice; things may work out fine, "you never know." Moreover, since these alternative placements are usually in the home LEA, parents prefer them. When given a choice, parents tend to choose placements closer to home over ones that may be more appropriate programmatically but are in another school district. Why rule exceptions are needed, the politics surrounding them, and how they are worked out will be discussed at some length in the section "Midland Special Education Instructional Programs."

Trial Placements

In addition to the temporary placements which result from rule exceptions (many of which, in effect, turn out to be trial placements), two other types of trial placements are used; one formal, the other informal. The formal trial placement resulted from a recent rule change which allows a student to be placed for 45 days in a different program. There appears to be support for the change among building principals, although not all districts have used trial placements yet. Building administrators who have used them, however, see them as an essential part of a maintenance program in which a student can be returned to a regular classroom on a full-time basis for a trial period; if the student can be maintained there, he can be staffed out of his former special education program.

The informal version of the trial placement idea is used by the director in situations where parents simply do not want their son or daughter sent to a special education program in another LEA, regardless of whether the staffing team thinks it is the best program (most appropriate) for him or her. In many ways, it is very similar to a rule exception. The trial placement uses the resource room "as a net." The director will place a student in the resource room in the home district on a trial basis (all LEAs have their own resource rooms). If the placement works out, as they do about half of the time (remember, "you can never tell"), another staffing is held and the student is officially placed in the program. When these placements don't work out, parents usually can be convinced that their child does, in fact, need the program that was recommended at the staffing, which is located in a neighboring district. In some districts, a resource room placement is almost always recommended first. Here, more restrictive placements are considered only when the student cannot be maintained in a resource program. Again, about half of these trial (or "net") placements work out to be the placement of choice.

Regardless of whether the child is placed in the program recommended at the staffing or placed in an alternative program via trial placement or rule exception, the parent must approve of the placement before it can be made. Of course, there are due process procedures that can be used by the LEA or REA to appeal a parent's decision as well as by the parent to appeal a placement decision made by the LEA or REA (refer to Figure 11). However, actual use of the process is extremely rare.

Minority Report/Due Process

Any party in a staffing who disagrees with the decisions made can file a minority report with the Director of Special Education. The director can opt to accept the majority opinion, commission further evaluation and another staffing, or simply call for a restaffing. His role is to facilitate a resolution, to come to a compromise without compromising the adequacy of the child's eduational program. If a compromise can't be achieved, he refers the case to the DPI, Division of Special Education, for an opinion. If this doesn't resolve the case, an appeal is made to the State Hearing Officer for a due process hearing. Here again, it is extremely rare for a case to go beyond the minority report mechanism. In fact, the Heartland area has had only one due process hearing in its 7 years of operation (the REA/LEA won the appeal, the student is doing fine, the parent has become agreeable). It should come as no surprise that so few due process hearings have been called for when one considers the placement flexibility the director has at his disposal.

Other explanations for the lack of due process hearings have been offered, however. Some observers believe that the full range of complaints will never be known because parents are either reluctant to present them to the REA or are not knowledgeable enough about their rights to know when a complaint may be warranted.

The Individualized Education Plan

Before any student can be placed in a special education program (as a result of the staffing procedure) or start receiving special education support services, an IEP must be completed. The general arrangement is to have the IEP completed at the staffing conference. In practice, the preliminary aspects of the IEP are completed prior to the IEP conference, i.e., evaluation results, a list of strengths and weaknesses, and current level of functioning (in essence, the information needed to make decisions). At the meeting the tasks are to decide if the student is qualified, reach consensus on program and placement, and to identify goals and objectives. In general, broad goals are identified at the meeting and, although some objectives are drawn from the goals, most of the objectives are written afterward. Typically, the special education teacher (LEA or REA) writes the objectives either under the guidance of or in conjunction with the special education consultant. In any event, the consultant is the certifying official, representing the director, and must sign-off to make it official. The consultant, through the REA, takes care of all typing and duplication and sees that copies are distributed to each person responsible for implementation.

If the child's program involves regular classroom placement, the regular teacher is involved. In these cases (primarily, students who will be served in resource rooms and the regular classroom), the special education resource teacher visits the regular teacher and collects from him or her the "regular class objectives." The resource teacher, most often with the consultant, consolidates the regular class and resource room objectives and devises the IEP objectives. The consultant certifies the IEP and has it typed, duplicated, and distributed.

As formal and comprehensive as the staffing process appears to be, the process begins to unravel at the point of implementation, particularly when implementation involves coordination between the regular classroom and the resource room. Most regular teachers appear to have adequate input into the IEP through the referral and conference stages, although some admit in regard to this input that they "don't know what weight it carried." However, when it comes to carrying out the IEP, the regular teacher often is not involved. In these cases, regular teachers do not receive copies of the IEP document, and when they do, it is just that--a document. And when the regular teacher is not involved there is no meaningful way to coordinate what goes on in the regular classroom with the resource room program; few instructional accommodations are made in the classroom for the student, within-class ability grouping notwithstanding, and the student's program ends up being two programs--a regular class program and a resource room program. This dual-program implementation of the IEP is by no means universal in the Midland schools; some manage to coordinate their efforts to a greater degree than others. But, by and large, when one considers primarily the mildly handicapped student, who tends to be served via the resource room model, a program that is coordinated between regular and special education occurs far less often than one would hope for.

Value of the IEP

One should not assume from the above discussion that the IEP is widely disregarded. Although, in general, there is not a great deal of commitment to IEPs, the value placed upon them varies according to whether one talks with administrators or teachers, or regular or special educators.

Administrators, in general, tend to place more stock in the IEP. Most would agree with one administrator who said, "the paper flow is quite great, but good things have happened as a result." He, like other administrators, believes that students have better programs because they have IEPs. And, although some question their usefulness as instructional tools, many see the IEP as a "vast improvement" for planning and monitoring students' programs.

It is not surprising to find that regular and special teachers hold different views of the value of the IEP. Special educators are accustomed to such planning and, although some see the IEP as a "glorified lesson plan", most use it as a "long range plan." Certainly, special education teachers who work with moderately and severely handicapped students in self-contained settings value and use IEPs; they have always used similar procedures to plan for and evaluate instruction. Again, it is in the regular-special education arrangement (the mainstream setting, if you will) that the usefulness of IEPs tends to fade. And, although the IEP serves its purpose on the resource room side of the arrangement, its value on the other side--the regular classroom--is most suspect. Even some resource teachers believe that generating extended lists of very specific objectives, which often takes 3 to 4 hours per student, is not the most efficient use of their time, time that could be better spent working directly with students. Moreover, most believe that "goals and objectives are not the key thing" anyway. What really counts is the communication between the regular and special teacher and the coordination of effort between the regular and resource programs.

In the best of worlds, special education teachers would like to meet with the regular teacher daily or, at least, twice a week. But this is impossible given the time available to both types of teachers; and spending time generating specific lists of objectives makes the chances of holding such meetings even more remote. Most regular and LEA resource teachers would agree that too much time is spent in the conference reviewing assessment results and not enough time specifiying objectives and instructional methods. Perhaps they believe that, since they are both there and their time is limited outside the conference, more time should be spent helping them with the important job of coordinating instruction. Further, some regular teachers question assessment results presented by REA staff. They believe that they can tell the group more about the level of student functioning based on their daily work with the student than an outside person can from administering a few tests. However, they usually keep these feelings to themselves.

Although inservice education and the passage of time have reduced the perception of the IEP as simply "required by law" or "a bureaucratic thing that has to be done," some teachers continue to hold this view. Even so, one should not discount the impact IEPs have had on the system. If some regular administrators had their way, they would require IEPs for all students. This realization, although it might surprise some special educators, most likely comes as no surprise to the REA special education division. In fact, the common view there is that the IEP process serves as staff development for building principals; the hope being that principals will become more knowledgeable about special education students and programs. What they may not have expected, however, is that principals would generalize the IEP process as a means to improve the regular education student's school experience.

Review Process

As was mentioned earlier, during the 1981-82 school year consultants participated in more than 3,500 staffings. Obviously, given the size of the special education student population, most of these were review rather than initial placement staffings. Each student's IEP and program is reviewed at least annually and, at 3-year intervals, each student is re-evaluated. Although this is the general rule for LEA-operated programs, some REA-operated special programs review student IEPs every 9 weeks. In these instances the schedule looks something like this.

9 weeks: parent conference and a written report (parents can add objectives to the IEP at this point)

18 weeks: formal annual review and a written report (attended by all persons providing services and the parent)

27 weeks: written report only

36 weeks: parent conference and a written report.

Parents are requested to attend the formal annual review but may attend conferences as noted and receive copies of the written reports. Support services staff write reports reviewing progress relative to the services they provide and may attend the review staffings, meet with parents individually, or simply submit the report to the teacher who then shares it with the parent. Since the need for any re-evaluations is noted at each annual review, the 3-year re-evaluation is handled as a matter of course within the yearly evaluation cycle. Thus, for students in REA programs, re-evaluations are conducted when they are needed and not merely at the end of a 3-year period.

The scheduled reviews of the IEPs in LEA-run programs vary somewhat but, in general, are conducted only once a year, in conjunction with the annual review. Even though this schedule meets the minimum review requirements, some special education teachers feel that reviews need to be conducted more often and view the "one a year" arrangement as a weakness of LEA special education programs. Moreover, some LEAs conduct the annual review at the end of the school year; building principals agree that this needs to be changed since an end of year review precludes taking action on any program deficiencies that may be uncovered.

Introducing IEPs in the Midland Area

Of course, the Midland area is way beyond the introduction stage, but let us use this opportunity to give you a glimpse of the director's administrative style. In 1975-76, when IEPs were first introduced, the director was cited by the DPI for noncompliance with the IEP requirements. It came as no surprise to him, however, because his goal was to "soft-pedal" the IEP for a year, to "phase it in gradually." Rather than frightening the LEAs by being hard-nosed about it, he proposed an IEP format and gave it to the LEAs for their input. Over the course of that year, revisions were made and the year ended with a product that could be implemented the next fall. The director was where he wanted to be, although not where the DPI expected him to be. He didn't care, however, and to this day he believes that the time spent was well worth it.

MIDLAND SPECIAL EDUCATION INSTRUCTIONAL PROGRAMS

This section describes the types of special education programs in the Midland area which are provided by the LEAs and the REA. The first several sections that follow concentrate on school-aged programs. The preschool programs are discussed later in the document.

Instructional Program Options for Students

Listed below is the continuum of instructional services available to Midland students.

Option 1 Regular educational program.

Option 2 Regular educational program with supportive programs or services (not special education) available to all students.

Option 3 Regular educational programs with the addition of special educational instructional materials, equipment or devices or special adaptions of materials to meet the pupil's needs.

Option 4 Regular educational program with special education consultative services.

Option 5 Regular educational program or special education program with special education consultative service for parents or family.

Option 6 Regular educational program or special education program with provision for special transportation of pupil.

Option 7 Regular educational program in addition to itinerant special education support personnel working in the regular classroom or other facility.

Option 8 Regular educational program in addition to special education resource teaching program.

Option 9 Special education class with integration in the regular educational program.

Option 10 Self-contained special education class.

Option 11 Regular or special education service combined with a private or public supplementary program.

Option 12 Special day school.

Option 13 Special boarding school or residential facility.

Option 14 Home service/hospital service.

Option 15 Combination of other options.

Although all 15 instructional options are available and used in the Midland area, 5 (which subsume most of the others) are most relevant to our discussion. The weight and a description for each are provided in Table 10 (p. 101b). You will recall that children are assigned to program options on the basis of their educational needs rather than according to categorical labels. In general the smaller districts offer programs for mildly handicapped students: learning disabled (LD), educable mentally handicapped (EMH), and mild emotionally disabled (ED). The REA provides programs for trainable mentally handicapped (TMH) students; severely/ profoundly handicapped students (S/PH); chronically disruptive (CD) students, who are served in self-contained classrooms in Lincoln Center only; hearing impaired (HI) students, who are served in self-contained and resource programs as well as on an itinerant basis; and visually impaired students (VI), who are served by an itinerant teacher in their home districts. These students are, of course, in addition to preschool handicapped children.

Program Options for Local Districts

Each LEA has four options for providing special education instructional programs for its handicapped students. They are:

1. to provide the program in the home district
2. to send the student to a program provided by another district and pay tuition and transportation
3. to send the student to a program provided by the REA and pay tuition and transportation
4. to send the student to a program provided by a private or state agency in the Heartland area, in some other area in the state, or in another state and pay tuition and transportation.

There is a pattern to the types of programs which districts provide on their own and which they don't. The pattern is related to both the severity of the handicap (which is highly correlated to prevalence) and the size of the district; the more severe the handicap, the more likely the district is to ask another agency (an LEA, the REA, private or public agency) to provide the program for the student; the larger the district the more likely it is to provide its own programs, even when severity increases. In addition, the larger the district, the less likely its more severely handicapped students are to have to travel outside the city limits for services. This is true not only because these districts tend to provide more of their own programs but also because the REA (which provides virtually all programs for more severely handicapped students) has located its 2.0 and 4.0 programs in the larger population centers in the Midland area.

Figure 12 illustrates these deployment patterns. One can see that the instructional programs offered by the REA are located in three cities which are located more or less to reduce travel as much as possible for districts (and their students) within the region.

Table 10

Five Basic Instructional Program Options

Placement Type[1]	Weight	Description	Example	Number of Students Served
Supplemental Assistance	1.7	Regular educational program with supportive programs, services, materials, equipment, and/or transportation.	Actually represents seven options for various types of assistance. None remove the student from the regular program.	15
Resource Teaching Program	1.7	Pupil remains in the regular program for most of the school day. Provides for at least 30 minutes and not more than 2 hours per day in the resource room.	Multi-disability resource programs, resource teaching programs for pupils with learning disabilities, hearing impairments, etc.	1,686
Special Class with Integration	1.7	The pupil is in a special class more than half of the school day, but is integrated with other pupils in regular educational programs whenever appropriate. Time spent in the special class is determined by the degree of intervention necessary.	Special class with integration is an option in all categorical disability areas such as mental, emotional, learning, communication, physical disabilities, etc.	465
Self-Contained Class	2.0	The pupil receives most of the basic educational experiences through an instructional program in the special class. Experiences are supplemented by inclusion in those parts of the total school program when appropriate and provision of supportive services as needed.	Special classes are possible in all disability areas. Supportive services may be offered by consultants in specialty areas (vision, communication, hearing, learning disabilities, etc.) or school psychologist, school social workers, etc.	137
Self-Contained Class	4.0	The pupil receives all of the basic educational program in the special class.	Special classes are provided for students who are severely/profoundly handicapped and for students who are chronically disruptive.	173
Total				2,576

[1] Preschool options not included.

BEST COPY AVAILABLE

Figure 13 presents the same map, except that it illustrates the flow of students among districts who are involved in inter-LEA programs. Also noted are the district's home-LEA program offerings. One can see that virtually all LEAs offer resource programs and that the bulk of the traveling is carried by students who are weighted 2.0 and 4.0. These students travel to other LEAs to participate in LEA or REA programs and tend to be students who are identified as trainable mentally handicapped or severely/profoundly handicapped.

Options for Parochial Schools

Parochial schools can request itinerant services for visually impaired and hearing impaired students as well as consultative services from REA special education consultants. These services are free of charge since they fall within the realm of support services.

Parochial schools receive the full range of support services, media services, and other educational services provided by the REA: hearing and vision screenings, counseling and guidance services, tutors for students who study English as a second language, computer services, and the rest. Special education consultants and support services personnel arrange and conduct IEP conferences for students who need special education instructional and support services. In all respects, when it comes to any of the REA's special education, media, or educational services, the Heartland parochial schools are treated just like the LEAs.

Parochial schools, however, offer no special education instructional programs of their own. If a student can be maintained in a regular classroom with itinerant or consultative services (hearing impaired and visually impaired), the student is served at the parochial school via the REA. However, when a parochial school student requires a resource room program, or a self-contained class with integration, or a self-contained class, the student must disenroll from the parochial school and enroll in one of the public schools to be able to receive services (they can't be served on the grounds of the parochial school, although they can be tested there). These students are served then either in LEA programs or REA programs which are available in the LEA. Parochial school students who are learning disabled, mentally handicapped, emotionally handicapped, and severely/profoundly handicapped are served in this manner.

The Midland parochial schools are very satisfied and grateful for the support services they receive from the REA. They are also grateful for the instructional programs, since it would be impossible for them to provide these services on their own. As you might expect, however, parents whose children must disenroll from parochial school and attend public school classes are somewhat less enthusiastic, although they, too, are grateful that there are programs available. Parents are hurt by the arrangement; one parochial school administrator characterized parent's reaction by saying that "it destroys them." They have elected to send their children to parochial school for religous and/or educational reasons and removing that option is difficult to accept; some cry openly in staffing conferences. The saving grace, however, is that the student can return to parochial school (with REA follow-up services) if they can work back up to grade level; and this does happen occasionally. One thing that compounds parental reaction to disenrollment is that some students aren't identified as handicapped, learning disabled, for example, until they are in junior high school. It appears that earlier identification would alleviate the problem, in that disenrollment would come at an earlier age and, thus, allow a greater chance of returning to parochial school.

Home-LEA Special Education Program

The nature and range of home-LEA instructional programs vary by the size of the district. The Midland LEAs can be categorized by size generally, and relatively, into three types: small, medium, and large. Thirty-six of the 42 LEAs can be viewed as "small", less than 1,000 students. Five of the remaining 6 districts can be thought of as "medium" for the Midland area. These districts, Hawk Landing, Rutherford, Holton, Wonder Bay, and Cedar City, enroll between 1,300 and 2,000 students, approximately. Finally, the largest city, Lincoln Center, with a public school enrollment of over 5,600 students, serves as the home of the REA. Figure 14 illustrates the flow of students to these centers.

Table 11 indicates the number and types of special education programs offered by the 36 smallest districts on a home-LEA basis. It is immediately evident that every LEA offers at least one special education program and that all districts offer either an LD or multi-categorical resource room program, with one-third offering both types of resource rooms. The multi-categorical resource room is the most popular program with 29 LEAs offering either an elementary, junior high, or senior high version; 11 districts offer multicategorical resource room programs which cover the entire school-age range.

Twenty-two districts provide LD resource rooms, of which 13 offer elementary programs, 18 offer secondary programs, and 7 offer both. Educable mentally handicapped youngsters are served predominantly in multi-categorical resource rooms at all grade levels; 6 of the 39 districts maintain self-contained with integration (SCIN) classrooms for these students, while one district provides a self-contained EMH class.

As the categories of exceptionality become more severe, and thus student numbers become fewer, the programs become nonexistent; only two LEAs maintain their own TMH classes, for example. No REA special education instructional programs are housed in any of the 36 smallest LEAs, except for the DLC in East Johnson. These districts provide programs for moderately and severely handicapped students by sending them to the programs offered by the REA. They do, however, on occasion send a mildly handicapped student to another LEA or take one in from another LEA when the need arises. However, for the most part, they provide programs for their own mildly handicapped students and use the REA's programs for their moderate to severely handicapped students, except, of course, for Drystal Lake and Watson which provide their own TMH programs and take in TMH tuition students from neighboring LEAs.

The group of five "medium-sized" districts can be characterized as special education centers in their respective regions; they offer more

Table 11

Special Education Programs Offered in Midland's Smaller Districts

School Districts	Enrollment	Learning Disabilities Resource Room			Multicategorical Resource Room			Educable Mentally Handicapped SCIN			Educable Mentally Handicapped S-C			Trainable Mentally Handicapped S-C		
		E	J	S[1]	E	J	S	E	J	S	E	J	S	E	J	S
Powell Consolidated	175				x	x										
Greenfield	180				x	x										
Dutton	210				x											
Foster	222	x			x		x									
Clark Valley	225				x		x									
Honnecker-Muller	225	x					x									
Doud	225				x											
Highland	250				x	x	x									
Bradford	250	x		x												
Sunville	275															
Schilling	282				x											
Rohrville	300	x	x	x												
Cedar Creek	311			x	x											
Lowell-Liberty	335			x	x											
Wolfe	335			x	x											
Crystal Lake	335			x	x									x		
Branson City-Newbolt	350			x	x	x	x									
Linden	358				x	x										
Northeast Mason	365	x					x									
Central Mason	366	x		x												
Apache Rapids-Reinhardt	372				x		x									
Twin Oaks	373				x		x									
Southwest Johnson	380	x		x												
Scott City-Boonesdale	400			x	x											
Skyview-Lee	470	x	x					x	x	x						
Larrouse-Grant	530	x				x	x									
Thurbolt-Anthony	580				x											
Garden City	590				x		x			x						
Alma	600				x		x									
Parker City	610			x	x						x					
Watson	620				x		x							x		
Mesquakie	635	x		x				x[2]		x[3]						
Hill City	730			x	x					x						
East Johnson[4]	750				x		x[5]	x	·	x						
Clearview	773			x	x	x			x							
Wheatland	800				x		x									

[1] E = elementary, J = junior high, S = secondary

[2] Multicategorical SCIN class

[3] Two junior high EMH SCIN classes

[4] Operates its own Developmental Learning Center

[5] Two secondary multicategorical resource rooms

BEST COPY AVAILABLE

special education programs than any of the smaller LEAs, which serve their own students as well as students from surrounding LEAs. Table 12 lists the five LEAs and indicates the number and type of programs they offer. Immediately evident is the pattern of LD versus multi-categorical resource rooms across the five LEAs. Each district maintains a virtually complete compliment of SCIN classrooms for EMH students and three of the five maintain self-contained EMH programs. One district, Rutherford, offers a multi-categorical SCIN classroom, while two of the five offer both self-contained EMH classes (elementary only) and SCIN rooms that serve LD students only.

In addition to their own programs, three of the five LEAs, Hawk Landing, Wonder Bay and Rutherford house REA programs; 11 and 2, respectively. These districts are referred to as host-districts. Other districts in their respective regions who have students who need these programs bus the students to them; the districts sending students, naturally, pay tuition to the REA for these services.

As one would expect from its size Lincoln Center offers many more programs. However, the pattern of types of programs is very similar to the five medium-size towns, except that many more ED classrooms, which are all self-contained operations, are offered. The only unique offerings by the Lincoln Center LEA, besides the number of ED programs, are the self-contained program for physically disabled students and three of the Midland area's four hearing impaired classrooms.

The REA houses one preschool, one elementary, and one junior high hearing impaired program in Lincoln Center and one preschool program in Wonder Bay. Although these programs are primarily self-contained, some integration does occur at the elementary level, with even more integration in junior high. In fact, in junior high the hearing impaired program has evolved into a resource program. Hearing impaired students attend regular classes and go to the hearing impaired classroom for services only one period each day. Each hearing impaired classroom has at least one aide. When hearing impaired children are integrated into regular classrooms, the aides often accompany them as interpreters.

Like Rutherford and Wonder Bay, Lincoln Center serves as a host-district for the REA, housing 21 of their special education classrooms. The entire range of programs available in Lincoln Center, through either the LEA or the REA, represents virtually the entire range of special education programs.

Inter-LEA Special Education Programs

Inter-LEA special education programs are arrangements formed between two districts, a sending and a receiving district, for the provision of a special education program of one type or another; this nearly always includes a program for the mildly handicapped student. Arrangements are made between and among the 36 smaller Midland districts as well as between the smaller and the medium-sized districts and between the Lincoln Center LEA and the smaller and medium-sized LEAs in its general area.

Table 12

LEA Instructional Programs

School Districts	Enrollment	LD/RTP			Multi/ RTP			LD/SCIN			Multi/ SCIN			EMH/SCIN			LD/S-C			EMH/S-C			TMH/S-C			ED/S-C			CD/S-C			PD		
		E	J	S	E	J	S	E	J	S	E	J	S	E	J	S	E	J	S	E	J	S	E	J	S	E	J	S	E	J	S	E	J	S
Eagle Grove	1,298			1	3	2	1	1	1	1				1		1				1														
Jefferson	1,344	1	2				1				1	1		1	1	1																		
Humbolt	1,460				2	1	1								1	1				1							1	1						
Storm Lake	1,609				5	1	2	1		1				1	1	1																		
Webster City	2,105	5	2				1	1						2	1	1				1														
Fort Dodge	5,643	4	2	3	9	2	2	2	4	2				2	2	1				1					1	3	2	1				1		

REA Instructional Programs

School Districts	Enrollment	LD/RTP	Multi/ RTP	LD/S-C	EMH/S-C	HI/S-C	HI	TMH/S-C	ED/S-C	CD/S-C	S/P[1]	NCC/ SCIN[2]	DLC[3]
Eagle Grove													
Jefferson								E-1					
Humbolt													
Storm Lake							E-1	E-1 J-1	E-1		I-2 II-1		2
Webster City													
Fort Dodge					J-1	E-2	E-1 J-1	P-2 J-2 S-1	E-1	J/S-4	P-1 S-1	S-1	4

[1] Severe/Profound

[2] Multicategorical program in vocational education at NCCC

[3] Preschool classes; Developmental Learning Center

E = Elementary
J = Junior High
S = Secondary

P = Primary
J/S = Junior/Senior High

I = Level one
II = Level two

BEST COPY AVAILABLE

Inter-LEA Program Costs

When one LEA arranges to send one of its handicapped students to a program offered by another LEA, the standard arrangement is that the sending LEA pays tuition and transportation. Tuition is based on the receiving LEA's total cost of operating the program (teacher, facility, materials, and an aide, if one is necessary) divided by the number of students who attend the program. Each sending LEA is charged this cost for each student it sends. Therefore, tuition is variable based on total program costs, the number of students who are in the program (and, more importantly, stay in the program; a point that is addressed below), and transportation costs. Tuition costs are never a certainty as one attempts to decide whether to send a student to a particular LEA program. For example, real tuition costs may not be known until the last minute since a number of administrators from various sending districts must make their final decisions to send or not to send before any one of them can calculate individual costs.

Another uncertainty stems from the fact that students who need special education services are not always known on the first day of school. Students do get identified mid-year, but what is even more troublesome for administrators (because it happens more often than mid-year identifications) is the student who comes to the district, after the December 1 official handicapped student count date. Although the district will receive a weighted enrollment allocation for the student, it may take as long as a year and a half to get the money. This is problematic because special education budget balances and deficits are figured at the end of the current year. And, remember, under the current system for dealing with special education budget deficits, the only option available is permission from the SBRC to raise the local tax levy. What is even more aggravating about the post-December 1 enrollee is that the administrator knows that the money to educate the child is in the special education budget of some other LEA; an LEA that doesn't need it now that the student has moved!

Transportation costs currently are the most stable factor in the algorithm. However, not long ago the fluctuating price of oil was enough to keep the fiscally-minded administrator up nights. There are, of course, other problems associated with transportation; the biggest of which is that the transportation costs are not always covered by the weighted enrollment allocation. This happens particularly when tuition costs are higher than they should be because the receiving program is not running at full capacity. For example, let's say that a student who needs to attend a program in another LEA generates $7,000 in weighted enrollment dollars for the sending LEA and that transportation costs are $3,000. If the receiving program is not running at capacity (less than the maximum class size), tuition could run as high as $6,000. So, instead of meeting the costs with the weighted allocation, the sending LEA is out $2,000 ($6,000 tuition plus $3,000 transportation less $7,000 reimbursement). In case one thinks $3,000 is high for transportation, remember that some students travel up to 55 miles one-way to programs, particularly students who have low-incidence handicaps and for whom programs are fewer in number and farther between. So why not offer more of these programs? If one were to offer more programs, the tuition costs would be higher still since there are only a limited number of students who require such high-cost programs.

There is a built-in incentive in the funding mechanism to serve students closer to home, because of transportation costs. This factor comes into play more for mildly handicapped students for whom instructional programs can be more readily "jury-rigged" in the home LEA. And, because there are incentives to save money (keep property taxes in mind) and ways to do it (other ways besides transportation will be discussed below), one should not be the least bit surprised that local districts keep youngsters at home whenever possible.

Before we talk about other ways to keep from overrunning an LEA special education budget, let's review the way budgets get eaten up that aggravated administrators the most in times past. The problem is referred to locally as "pull-out" and here is how it might happen. Three LEAs are cooperating to provide a special education program. One LEA provides the program and each of the three districts send an agreed upon number of students, which determines tuition costs per student and, thus, per LEA. One administrator, in the words of our informants, "thinks there's money to be made" and starts his own program. Because the tuition charges are based on total costs divided by the number of students, the other two LEAs' costs go up and, again in their words, "this robs kids." Because this fiscal "gamesmanship" was getting out of hand, three years ago the DPI strongly encouraged the LEAs to go beyond the "gentlemen's agreements" by forming contracts among themselves. Now in most cases program costs are calculated among the participating LEAs and one-year contracts are drawn. Although the pull-out problem has been addressed for now in some districts, the fiscal gamesmanship has by no means ceased; the game continues to be avoiding special education cost overruns. Of course, the bigger issue here is that as long as cost overruns for special education can be made up only through increased taxes, ways will be devised to save money on providing services.

When local administrators first started dealing with special education budgets under the new funding system, their primary concern about a budget overrun stemmed from the fact that the SBRC had been used for years to audit general education budgets that were on shakey fiscal ground. It had always been considered a "black mark" against administrators if they ever had to deal with the SBRC. It took some time for the REA to convince the administrators that overruns in their special education budget were not the sign of a poor fiscal manager. Now, most administrators have come to accept the fact that an overrun in their special education budget does not carry the same stigma. However, they continue to try to avoid them because of the increased tax levy consequences.

Reducing LEA Costs for Special Education Instructional Programs

Most pupil weighting systems contain incentives to place students in more restrictive settings because such placements generate more special education dollars. The system doesn't work that way here; transportation costs tend to eat up the money generated by the higher weights because the higher-weighted programs are typically farther away from the sending LEA. Moreover, one must remember that the heavier the weight, the more costly the program. The 4.0 weight carries with it a teacher-student ratio of one teacher plus an aide for five children. Thus, "overweighting" is a rare occurrence.

The real incentive here is to place students in the home LEA. There are some obvious advantages to placing students closer to home; parents tend to like it, the district assumes more responsibility for special education. There are trade-offs, however, as one might expect. And, of course, the primary concern must center on the adequacy of the child's program. Now, before one starts imagining severely handicapped students sitting in resource rooms with learning disabled students, let us assure the reader that severely handicapped youngsters and other students with low-incidence handicaps are not kept in the home district to save a buck. We are referring to mildly handicapped students (primarily LD, EMH, and ED students) when we raise the issue of adequacy of program versus program costs. And let us assure you further that the issues involved here are discussed openly by REA and LEA administrators. What is perhaps most interesting are the ways local administrators go about manipulating the system to create programs that pass muster under the rule exception procedure. Remember, the director must approve these exceptions and so must the child's parents, who tend to favor placements in the home district.

The changes in student placement (ones that depart from the program recommended by the staffing committee) that local administrators propose can be classified by what factor(s) in a child's placement they manipulate: the diagnostic label assigned to the student, the certification of the special education teacher, the age range of the students in the class, the student adult ratio, or some combination of these.

Teacher-student or, more precisely, adult-student ratios are manipulated by using paraprofessionals. If an LEA has reached the maximum class size for a particular program, has more students to place but not enough to start a second class, it compensates by over staffing the program (more students than the maximum allowable) and hiring an aide until the numbers build up to justify an additional class.

Teacher certification is a persistent problem for rural administrators. They can't seem to recruit certifiable teachers and feel they are at the mercy of the state department in deciding who's qualified to teach in their districts. And, although they say that the whole certification game baffles them, how they deal with it indicates more understanding than they apparently are willing to admit. They have side stepped certification problems to some degree thus far by relying more on multi-categorical resource programs than on categorical ones. If they have a teacher who is certified in mental retardation and emotional disturbance, for example, but need one who is certified in learning disabilities, they change their resource and/or SCIN programs into a multi-categorical program, for which a teacher need only be certified in two of the three categories and place all three types of students in the new program. Thus, the recruitment/certification problem is solved.

Perhaps the most difficult manipulation to arrange is a "label change." Actually, the label is not changed. Rather, a student with one label is placed in a program which serves children with a different label (e.g., placing an LD student in a program designed for EMH students). It is this type of request that place REA psychologists and principals at odds. The problem starts when the psychologist labels a student as having a disability for which the principal has no program. Some principals, particularly in the smaller districts, resent the power the psychologist, who is acting on behalf of the director, has over them. Of course, the REA special education director knows that the end result of being too hard-nosed with building principals is that, in the long run, fewer students will be referred. His years as director of the Tri-County Special Education Cooperative, prior to Chapter 300 and under permissive rather than mandatory legislation, serve him well in these situations. "If you know you can't win the battle without going to war, and the student is not being hurt, and there's light at the end of the tunnel; sit in the wings and wait." The director relies on his influence rather than his power to convince superintendents and principals of appropriate programs for handicapped students because he knows that, as director of special education under the REA arrangement, "the one thing that gets you into trouble quickest is if you start directing."

One should not read into the director's administrative style a tendency to back off when faced with a difficult situation in an LEA. Quite the contrary; when the situation calls for it, he can be as hard-nosed as they come. But even when he uses his "power," one is reminded again of his past experiences and the finesse that has served him as his most powerful administrative tool; for example, when it's necessary, he doesn't hesitate to ask the DPI attorney to call a superintendent to inquire about a case or to request an invitation to speak at the superintendent's next school board meeting about another case. But even when such measures are necessary and even though he wins "the battle," he never takes his eye off "the war"; somehow he'll leave the LEA with the superintendent thinking that he, rather than the director, had won the battle. No one loses face.

And how do the local administrators take to the director? They like him; they can "badger" him and he them. There are no hard feelings, say the local administrators; they see him as someone who is willing to bend the rules to make them fit the situation. And although he rarely has to convince an administrator of the need for a particular program, the flexibility built into the system via the rule exception is, like the director maintains, essential. Moreover, he has everyone convinced that he bends the rules just for them.

LEA Special Education Staff

As we have noted previously, the REA provides instructional programs for moderately and severely handicapped student populations. Special education programs for general special education students (LD, EMH, ED), which involve regular classroom integration, are provided by the LEAs.

It is not the REA's purpose to provide the integrated special education programs. In fact, the goal of the REA is to have LEAs take as much responsibility for their own programs as possible. To be sure, the REA is there to provide the support services necessary to allow LEAs to deliver their own mildy handicapped programs but, in the main, the REA does not push LEAs to let them provide these programs.

From the REA's perspective, there are both advantages and disadvantages to LEA-operated programs for mildly handicapped students. The advantages center on the acceptance of responsibility on the part of local districts and communities for their handicapped students. The disadvantages really boil down to one: the quality of LEA special education staff. This in no way means that all LEA teachers of mildly handicapped students are inferior, quite the contrary. There are many good teachers throughout the Midland area. One is likely to find them in any classroom, large or small district, REA or LEA program. What it does mean, however, is that, in general, the quality of the special education teachers who have been hired by LEAs is less than one would hope for given the demands of the job.

Why are the LEA special educators less than qualified? What are the demands of the job? Before we can talk about the quality of staff, let us say a few words about the demands of the job. It is no longer sufficient for teachers of mildly handicapped students to be good teachers, particularly when their students spend some, if not most, of their time in regular classrooms. Today's special education resource teacher needs to be many things beyond a good teacher including a public relations person, a change agent, a mediator, an advocate, a facilitator, an inservice education provider.

Although some teacher training programs have begun to update their training curriculums to reflect the demands placed upon special educators by P.L. 94-142, most have not; and, even those that have, have only scratched the surface. More will be said about preservice special education teacher training later in the report. For now, it is important to understand that many of the special education teachers that constitute the selection pool have not been prepared adequately for the demands of the job. Moreover, it is questionable whether many of skills required can be developed through training.

The quality (as it relates to the demands of the job) of the Heartland LEAs' special education teachers is affected by recruitment and retention problems that plague most, if not all, rural districts. These issues will be addressed in later sections. For now, it is enough to understand that it is difficult to attract large numbers of special education teachers to rural areas.

The first reason relates to the way, and by whom, teachers are selected. Typically, this is the job of the superintendent who, in the smaller LEAs, most often is faced with two problems: first, not knowing the qualities to look for in a good special educator and second, being forced to select the first candidate to show up. After all, another candidate may never be available. Of course, the REA could be a tremendous help with hiring, and in some cases LEAs ask the REA for help in recruiting. But because the hiring and firing of staff is a traditional symbol of the power invested in the superintendent, LEAs do not often ask the REA to be involved in the interview or the actual hiring.

Another reason LEA special education staff tend to be less than qualified for their positions is that, once hired, they have fewer opportunities for staff development than, say, the REA staff--both in the traditional sense (inservice education, professional conferences) and in the sense of professional colleagial relations. They are isolated, for the most part, from further training and from one another.

Of course, the REA delivery system is designed to account for the problems of professional isolation. After all, it is a rural delivery model and, as such, employs special education consultants to serve just this purpose. For reasons to be explained in the following section, the role of the consultant has been modified, in practice, in a way which negatively affects the ability to carry out perhaps the most important part of the job--providing consultation for LEA special education teachers.

The lack of adequate supervision is sometimes another reason for less than adequate quality (as we have defined it) among LEA special education teachers. Even though, technically, building principals are the supervisors of the LEA special education staff in their buildings, it is doubtful whether they have enough time to be real supervisors, given their other responsibilities. What are these other responsibilities? One must remember that, in addition to the perfunctory duties which have taken principals farther away from the role of instructional leaders as schools have become more complex, the Midland principals have quite a host of functions to perform which are related to non-instructional special education management--weighted enrollment counts, contracting for inter-district services, arranging and paying for transportation, negotiating rule exceptions.

The most serious general shortcoming of the current core of LEA special education teachers is their lack of impact on regular classroom teachers. As we have pointed out, the ability to affect changes in the regular school program is perhaps the essential skill in the arsenal of teachers of mildly handicapped students. Although most of the Midland LEAs' special education teachers are hard workers and good teachers of children, the REA special education consultants report that the results of their efforts to win over regular teachers, as it were, are quite variable. Many work to "educate regular teachers" about special education and mildly handicapped students, but some do not. Again, this is no small undertaking, nor is it something that one can be expected to do without training and experience. One LEA resource room teacher confessed that she simply didn't know how best to approach the regular staff. "I don't want to say 'hey, you're doing it wrong' or 'I know better than you'."

REA Special Education Staff in LEA Buildings

Acceptance appears to vary with the type of program and whether one considers instructional staff or support services staff. Although we will postpone comment on support staff until a later section, several interesting observations can be made about the acceptance of instructional staff.

An LEA learning disabilities resource teacher, who had worked previously for another REA which employed all special education staff whether they taught in REA or LEA programs, told us that, after her prior experience, she preferred being employed by the LEA. When the REA hires the special education teacher who works in an LEA "there's a real split" among the special teacher and the regular teaching staff and the special teacher is viewed as an "outsider."

Support for this "outsider" feeling was provided by a Heartland REA special teacher who operates an REA class with a considerable amount of integration in an LEA. Here again this teacher has contact with the regular program and reported the same perception. Moreover, because she feels like an "outsider," she has become reluctant to suggest improvements in the regular education program. She is reluctant to say "we should do this" because she doesn't feel that she's really accepted as part of the "we." As a result, she avoids any public comment about the regular program and, particularly, about teaching practices she observes.

In general, REA teachers who run classrooms that are totally self-contained but are located in a regular LEA building have a completely different experience. Although they are accepted as part of the staff without stigma, the climate of the building, in many ways, sets the tone for this acceptance. For example, some REA teachers feel "torn" between their loyalty for the REA and the building where they work. If they can't resolve their feelings, they can request a meeting with the REA consultant and the building administrator. Most report that this type of meeting, one in which roles and responsibilities are discussed, usually does the trick. But here again, building climate plays the biggest part. One can feel comfortable calling for these meetings in some buildings, whereas in others one is more reluctant to do so.

The Largest LEA

The Lincoln Center LEA and the REA have a special relationship--perhaps because of proximity, perhaps because of the LEA's size, but most likely because of history and tradition. The 1981-82 school year marked the forteenth year that the superintendent and director have been working together to provide special education services in the Fort Dodge area; 7 years under the Tri-County arrangement and 7 years under the current REA structure. The vast array of services did not crop up overnight; nor has it developed since the initiation of the REA, although preschool services and some of the other refinements are certainly due to SF 2001 and P.L. 94-142. Because they had a quality program before the special education mandate, Lincoln Center and the REA have been able to work together since 1975 to extend and refine what amounts to a very impressive array of services; certainly, the most extensive in the Midland area and, when taken together, enough to rival most any collection of programs in this or any other state. There has been time for this build-up, both from the perspective of the program's 14 year history and from that of the discretionary time created by resources which have flown generously from the REA legislation. In effect, experimentation--new programs, different delivery models--has been possible because a strong foundation existed and the resources necessary to erect a structure upon it have been available.

New programs have been and continue to be developed. The pattern has been that the REA initiates the new program, pays the start-up costs, stabilizes the program, and passes it on to the LEA. These experimental programs, of late, have been geared toward serving students better rather than simply establishing additional programs (since the need for new programs has leveled off). The latest one, for example, is a combination high-functioning TMH and low-functioning EMH class located in a regular junior high school. The program includes some integration with the regular program and appears to be very successful. When this class is transferred to the LEA, the REA will repeat the model at the high school level (current students will matriculate to the new program). Thus, we see that once programs are in place and the resources necessary to sustain them and make refinements are forthcoming, the rest is up to the talents and motivation of the people who are involved. The second stage of the REA's two-stage strategy--first get programs in place, then work on quality, is no where more evident than in Lincoln Center.

One should not assume that all relations between Lincoln Center and the REA are without friction, however. Lincoln Center administrators are just as concerned about money as the smaller districts in the area, and this occasionally takes precedence with them. But even though the REA knows when to take -- one more experimental program, one more student placed in one more regular class period, one more community excursion for TMH students, it also knows when to give.

For example, one of the REA special education consultants works full-time as the unofficial coordinator of all Lincoln Center special education programs (both REA and LEA), a service for the district certainly not without benefit to the REA. When lower enrollments began to force school closings in Lincoln Center, the REA offered to move one of its DLCs, which houses four classes for severely handicapped youngsters as well as a TMH classroom, into one of the regular school buildings that was slated to be closed; this saved the LEA from the objections of neighborhood parents, while at the same time, allowed the REA to integrate their classrooms into regular buildings. The REA doesn't miss a trick. There is more to this special consideration, however. One must remember that Lincoln Center is not a rural LEA. It has the student enrollment to perhaps survive without the REA. And although it currently does not have that option, there have been efforts to change the law to allow the state's larger LEAs to do so.

Although at times REA-Lincoln Center relations can become strained and even adversarial, it's a healthy relationship that has developed over time among essentially the same core group of actors.

Effects of Instructional Program Manipulations

The LEAs in the Midland area receive their weighted enrollment dollars for special education instructional programs in one lump sum (actually, quarterly) based on the previous year's December 1 child count. The money is not earmarked for specific children (indeed, some of last year's children may be gone and others may have arrived), rather, the total amount is used to support this year's total special education instructional needs. This fact, combined with the various ways costs can mount, described in the last sections, can sometimes cause budget overruns. At the end of the 1981-82 year, 11 of the 42 Midland LEAs were in a deficit situation (refer to Table 13). Overruns for 1981-82 ranged from a little over $100 to over $20,000; the average deficit was over $7,500; 6 LEAs' deficits were between $5,000 and $20,000, 3 of these were over $10,000. In 1980-81, 14 LEAs showed deficits that ranged from around $100 to over $11,000. Only 6 of the 11 LEAs that had special education budget deficits in 1981-82 (ranging from over $5,000 to over $20,000) had them in 1980-81, while 5 LEAs that had positive 1981-82 balances had 1980-81 deficits ranging from just under $1,000 to over $11,000. During these same periods, positive special education balances ranged from under $1,000 to over $172,000 (1981-82) and from $500 to $83,000 (1980-81). And, so we see that one is never sure about one's special education budget. Will it be enough? Student populations, as well as the specific needs of students within populations, fluctuate from year to year.

We have seen how LEA administrators deal with their fiscal plight by requesting and, in certain cases, receiving rule exceptions from the director of special education. The next logical question is, of course, what effect do these manipulations have on students?

As we have noted, rule exceptions are played out exclusively with programming for mildly handicapped students, LD, EMH, ED (sometimes referred to as the general special education population), those students who are served in resource rooms and who, for the most part, receive some of their instruction in regular classrooms. Manipulating program/placement decisions for moderately and severely handicapped students and very young and/or low incidence populations is simply out of the question.

The primary effect of rule exceptions is that students are educated in their home school districts. This, in most cases, coincides with the wishes of parents and, of course, the rule exception must always have formal approval from the parent. Other effects include label changes, 20 percent of the rule exceptions; increased class sizes, about 70 percent of the rule exceptions; and wider age ranges in programs (10 percent), which are not by any means unheard of in rural areas. But perhaps the most significant effect is the increased use of multi-categorical resource rooms rather than categorical ones.

The Host LEA

The reader will recall from earlier discussions that the REA operates direct instructional programs in three of the Midland LEAs--Lincoln Center, Rutherford, and Wonder Bay. These districts also offer their own special education instructional programs. The Wonder Bay LEA is of particular interest to us because of its location in the Midland area, the number of REA and home-LEA programs offered there, and, not of the least importance, its history as the host district for the Richland County special education program prior to the creation of the REA.

Wonder Bay has become a special education center within the REA itself, a sort of mini-REA, if you will. The REA satellite office located there has grown to be the largest in the area, housing 20 REA

Table 13

Midland Special Education Balance of Funds

Balance 1980-81	5% of 1980-81 Receipts	Balance Over 5%	Balance 1981-82	5% of 1981-82 Receipts	Balance Over 5%
3,935	6,125	0	18,817	6,589	12,228
13,526	7,235	6,291	434-	8,177	0
7,668	5,934	1,734	6,443	7,980	0
1,250	5,596	0	198	6,332	0
56,145	24,412	31,733	43,985	26,083	17,902
1,910-	6,769	0	2,329-	7,250	0
507	8,035	0	14,864	8,189	6,675
5,295-	3,830	0	6,035	4,184	1,851
11,018	1,845	9,173	3,208-	424	0
5,706	7,676	0	7,287-	8,219	0
6,009-	3,035	0	5,743-	3,351	0
18,128	9,396	8,732	37,830	10,191	27,639
5,902	18,891	0	39,362	20,320	19,042
2,127	7,109	0	2.995	7,613	0
5,710	4,357	1,353	21,388	4,767	16,621
620-	6,855	0	8,548-	5,935	0
8,242-	11,966	0	12,273-	11,588	0
4,627-	4,518	0	28,677	4,307	24,370
20,111	5,181	14,930	131-	4,704	0
14,677	6,790	7,887	13,170	7,869	5,301
28,729	19,838	8,891	39,556	20,122	19,434
6,349-	8,177	0	18,769-	8,151	0
5,457-	3,880	0	1,715	4,628	0
2,757-	3,031	0	1,583	3,523	0
6,304	3,553	2,751	5,906	3,959	1,947
5,000	10,505	0	350	10,569	0
3,087	6,941	0	24,287	7,093	17,194
2,361-	4,008	0	7,765	4,549	3,216
4,766	5,232	0	16,437	10,012	6,425
856-	2,359	0	10,477	6,527	3,950
14,255	7,167	7,088	34,167	9,127	25,040
5,798	4,517	1,281	2,964	4,392	0
3,012	7,509	0	19,068	7,869	11,199
10,029	7,309	2,720	22,068	7,655	14,413
11,268-	518	0	6,022	1,377	4,645
83,158	94,303	0	172,567	110,182	62,385
10,566	4,903	5,663	4,204-	4,192	0
27,598	7,050	20,548	8,568	6,806	1,762
12,119	14,425	0	38,300	12,957	25,343
13,309	4,404	8,905	19,704	4,487	15,217
10,966	18,490	0	17,903	19,908	0
154-	1,991	0	2,009	2,463	0
349,201	395,665	139,680	622,254	434,620	343,799

staff members. Wonder Bay serves all of the LEAs in its county as well as three districts adjacent to it. Students who need programs which are only offered there, either Wonder Bay's or the REA's, travel from up to 40 miles away to attend them. The Wonder Bay LEA operates 15 of its own programs and houses 11 others operated by the Heartland REA. Please refer back to Table _12_ for the mix of Wonder Bay and REA programs.

Naturally, the districts that send students to Wonder Bay are glad they have the option to do so. To meet some of their program needs they otherwise would have to send some students to Lincoln Center. Satisfaction with the arrangement, however, has become less reciprocal over the years.

Because the Wonder Bay LEA houses about twice as many special education programs as one would expect based upon its size, top level administrators have grown increasingly dissatisfied with the arrangement as host-district. At the peak of their dissatisfaction, the superintendent petitioned the REA to relieve what he referred to as the psychological strain of so many programs by taking over some of the special programs that were being maintained by the LEA. In particular, the superintendent wanted the REA to assume operation of all programs in Wonder Bay that served students from other districts. The REA rejected the proposal for two reasons. First, it could not afford to operate these additional programs given its current staff. Moreover, the REA was reluctant to take any action that would reduce local ownership of special children and programs.

The REA was not completely insensitive to the situation in Wonder Bay, however. In fact, the REA has gone out of its way to make things easier for Wonder Bay by installating a WATTS line between Wonder Bay and the REA central office in Lincoln Center; scheduling weekly visits to the LEA from the REA's Supervisor of Special Education Consultants; hiring LEA building principals as supervisors of both Wonder Bayand REA special education programs, and paying part of their salaries; and adding extra staff to the Wonder Bay special education satellite office. And, although it has been a gallant effort, it has not changed the minds of Wonder Bay central administration. Even with a WATTS line and weekly visits, communication does occasionally break down. The supervising principals are not happy with their new roles; they feel they are not qualified even though a special education consultant supervises programs and the principals merely oversee the staff. Even the REA special education staff who are assigned to the area admit that, local ownership notwithstanding, administration of the entire operation would be much simpler if the REA took over.

MIDLAND SPECIAL EDUCATION SUPPORT SERVICES

The REA provides ten separate types of special education support services for the Midland LEAs and parochial schools: special education consultants, school psychologists, school social workers, speech/language clinicians, physical and occupational therapists, itinerant teachers for hearing impaired and visually impaired students, audiologists, special education nurses, and work experience instructors. Although work experience instructors are a support service, their activities are presented in a subsequent section, "Midland Vocational Education Programs."

Special Education Consultants

The consultant role has been an evolving one in the Midland area. In general, the 12 special education consultants act as catalysts in the LEAs by identifying the need for new programs and assisting in their development. With regard to current programs, their job is to facilitate the delivery of appropriate services by consulting with LEA and REA special teachers, regular teachers, administrators, and parents. This entails the following activities.

1. coordination of placement and annual review staffings, consisting of preparation for, participation in, and writing reports for each staffing
2. consultation with teachers regarding new ideas, materials and methods to be utilized in their programs
3. consultation with teachers regarding the development and implementation of Individual Education Plans
4. providing information to teachers, parents, and principals relative to student needs in order to maintain well coordinated programs
5. providing assistance to parents in any concerns or interests they show
6. providing assistance to superintendents in completion of reimbursement claims, reporting of indexing data and notification of changes in special education rules and regulations

Although this list of tasks might be considered the consultants' "formal" role, in practice they spend about 80 percent of their time on the first and last activities and try to do the best they can with 2 through 5 in their remaining time, that is, the time that is left after "windshield time" is subtracted, which can amount to an hour per day. This might surprise one who is familiar with the traditional consultant role (a strategist who helps teachers work with students). More will be said about this arrangement in the following sections.

Special education consultants relate differently to special education teachers depending on who employs the teacher. They are supervisors and consultants to REA instructional staff, but only consultants to LEA special education teachers. In their supervisory capacity over REA special teachers, the supervising consultant functions as a support, in addition to being a monitor.

Evolution of the Consultant Role

Originally, the DPI wanted consultants to be deployed according to the categories of exceptionality in which they were trained and certified. However, because the Midland director didn't want consultants "passing each other on the road," as it were, he assigned them to serve specific geographical regions within the Midland area. Currently, they serve as consultants to the REA and LEA special education teachers in their assigned areas, regardless of handicapping condition. This is true except for those handicaps that require a more technical knowledge base, i.e., hearing impairments and visual impairments, and for preschool handicapped children. In these cases, there are categorical itinerant teachers and consultants who cover the entire Midland area.

One might reasonably ask whether multicategorical consultants have the necessary expertise to provide consultation in areas for which they have not been trained. The REA has addressed this issue by establishing several support mechanisms. First, as we have noted, specialized/technical areas are handled by categorical itinerants and/or consultants. This leaves, for the most part, the general special education areas, LD, EMH, ED. Most Midland multicategorical consultants have certification in LD. To provide the necessary support for EMH and ED, the REA uses a consultant "back-up" system in which consultants work with one another (certification in all three categories are accounted for across the total set of consultants). And, as we have mentioned, day-to-day instructional and management techniques for the three general special education populations (mildly handicapped) are not that different. For moderate to severe handicaps in these areas, consultants provide consultation to one another in, what amounts to, on-the-job training.

Another "back-up" for multicategorical consultants comes in the form of resource materials. The REA has adopted the System FORE criterion-referenced instructional system, which provides a vertical articulation of skills in reading, mathematics, and language. Consultants can use the system to help teachers diagnose, program for, and evaluate students in the areas which are dealt with most often in special education programs. Further, the REA has spent the last few years writing curriculum guides for each categorical area, which serve as guides for LEA and REA special education teachers as well as the consultants.

Of late, one of the preschool consultants has been required to assume responsibility for consultation in the area of severely/profoundly handicapped. Work in this area of exceptionality can be very technical. Here, the DPI provides workshops and mini-courses, and preschool consultants supplement this with self-study, visits to classrooms, and consultation with other consultants.

The REA appears to have dealt with the issues related to converting current staff to multicategorical consultants. This conversion, however, has not been the only change in the consultant role. Actually, there was another, and perhaps more pressing, reason for assigning consultants geographically; more than one consultant in an area increases the chances of "different messages" being conveyed to administrators, which, of course, reflects adversely on the REA. This rationale takes on more weight when one considers that special education consultants are the director's proxies in the LEAs; they assign weights to handicapped students and certify the weighted enrollment count for reimbursement purposes, interpret state and federal special education regulations, coordinate and do the attendant paperwork for placement and annual review staffings (over 3,500 this year), and coordinate all REA special education programs in their assigned region. Thus, in effect, the special education consultants have become, in practice, administrative consultants.

This is true only in the small LEAs; administrators in the larger towns, and particularly in Lincoln Center, have the experience and staff to go it alone. In the small districts, the special education consultant has become the administrator's "right hand man," doing the "footwork" necessary to make sure state and federal rules are followed and, of no small concern, making certain that weighted enrollments are all accounted for.

Although some consultants enjoy their administrative role and find it quite challenging, many do not. Those who prefer the traditional role have watched their careers change from teachers of children to teachers of teachers and now, finally, to "teachers of administrators." It wouldn't be so bad, they say, if the teachers didn't need their help; but, they do.

Although some special education teachers understand the administrative role of the consultants, many do not. Teachers are asking for more time from the consultants, which is not surprising. What is surprising, however, is that some administrators are saying, "Why aren't consultants in classrooms more?"

It is not difficult to understand why consultants have begun to fall out of favor with teachers. Special education teachers want help themselves but, more importantly, want consultants to help regular classroom teachers. They feel that consultants should return to the role of strategist; and, although many regular and special teachers are not satisfied with the consultative services they receive, nearly all of them are quick to add that it's not the consultants' fault. They are spread too thin--too many schools and, more importantly, too many roles. One politically astute consultant fingered the problem as "the title 'consultant'."

One should not assume that all consultants fail to meet the needs of their teachers. Even under the demands created by their administrative role, most consultants manage to meet the responsibilities of the traditional consultant role. Some hold regular after-school meetings with teachers to provide inservice education on requested topics, thus extending the 20 percent of their time available for work with teachers out of their own hides. For some, the work day and work week extend into the nights and weekends; some serve as board members for nonprofit handicapped consumer groups, some are directors and/or counselors at summer camps, some work with community planning groups to develop services for handicapped individuals. The list goes on.

Some consultants manage to maintain more of the traditional consultant role by incorporating "consultation to teachers" into their two administrative tasks (i.e., coordination of staffings and consultation to administrators). They accomplish this on a "one-to-one" consulting basis when, for example, they work with special teachers in developing IEPs or during the actual staffing sessions when they recommend new ideas, materials, and methods to be used with children. The net effect is that some consultants manage to extend the amount of time that they spend with teachers beyond the 20 percent that is left after administrative consultation. Moreover, it is not that administrative consulting is inappropriate. In fact, the director's position is that administrative consulting was (and in many cases still is) a logical first step when P.L. 94-142 and Chapter 300 were first introduced. The required change was so overwhelming that his plan of attack started with superintendents, then moved to principals, and will eventually concentrate primarily on teachers. His rationale has been that ignoring administrators would have been counterproductive. He feels that as superintendents and building administrators are educated and won over, more time can be devoted to teachers. His position is that working with teachers without first developing administrative support puts the cart before the horse.

School Psychologists

Although the largest proportion of the psychologists' time is devoted to psychometric testing and preparing psychological evaluations, they assist in designing intervention programs for handicapped students on the basis of evaluation results and in consultation with other special education support staff. As we have noted, their work is not limited to special education students. When students are referred for special education services but do not qualify for them, the psychologist provides follow-up services with the referring regular teacher.

In addition to these activities, psychologists provide classroom observations, direct counseling, attend parent conferences, and conduct teacher and parent group workshops. At the request of the local districts, the psychologists are available for "pre-referral" conferences in which the merits of the referral are reviewed. The school psychological services unit within the REA provides other assessment services as well, including kindergarten screenings (nearly 2,500 this year).

But, of course, the major function of the school psychologists in the Midland area is their role in the IEP staffing. In 1981-82, each psychologist conducted over 100 evaluations and, as a group, they participated in nearly 5,000 initial or review staffings; about 15 percent of the average school psychologist's time is spent in staffing conferences.

In the staffing, the psychologist's job is to synthesize for the group the evaluation results and identify the significant issues related to them. It is the psychologist who attempts to provide closure by suggesting a diagnosis and a label, although, in the end, final decisions are reached by concensus through the group process.

In many ways, the school psychologist is under the gun. Teachers who, from their perspective, are convinced a child is handicapped, come to staffings fully expecting a "handicapped" diagnosis. Yet, when the child does not meet the set criteria, the teacher, in some cases, blames the psychologist. Even when the psychologist suggests more tests, some teachers won't listen, believing as they do, that the child is already placeable. This scenario is particularly prevalent when the child is suspected of being learning disabled. Moreover, the new LD identification criteria make it more difficult to label a student as such.

A problem of even greater proportion has been discussed in previous sections, that of arriving at a diagnosis and program recommendation for which an LEA has no program. Here, the psychologist is on the front line; even though the director will ultimately deal with the situation, the psychologist is the one who must face it initially as well as live with the results. Building principals characterize psychologists by the degree of flexibility they show in these matters. From the perspective of some building administrators: "Too much power in one hand, the psychologist."

To be sure, there are complaints from teachers and administrators about too much time from referral to staffing, missed appointments, and the like; this is to be expected. However, when one considers the logistics inherent in the Heartland delivery system, it is totally unexpected, given current statistics on lag time and waiting lists in rural areas, that the school psychologists managed to maintain a 96 percent response rate on over 2,000 new requests for their services in 1981-82. And this is in addition to 5,000 conferences and 2,500 screenings.

Currently, the school psychological services unit is field-testing procedures and software developed last year to computerize analysis and projection procedures. Attempts are being made to develop a computer-based case information storage and treatment outcome system. The goal is to use computer applications to streamline operations.

Like other support staff, the 21 school psychologists are assigned to LEAs on a geographical basis. Ten psychologists are assigned to the central REA office, from which they serve the Lincoln Center LEA and the remaining schools in the county, certain other REA instructional programs, and the TAG program. The remaining psychologists are assigned to the other REA areas and work out of satellite offices. Four psychologists are assigned to the Storm Lake office due to the size and number of programs offered there.

School Social Workers

Two major goals for the school social work unit are to act as advocates for handicapped children and their families and to provide direct support services for children and families (evaluation, counseling, liaison, resource identification, etc.). As one might expect, human and public relations are a big part of the job. Although ongoing family counseling is not provided as a rule, the Midland social workers do provide individual and group counseling in the schools as well as parent counseling/education on a short-term basis. Referrals are made to community social service and mental health agencies when more extended family counseling is needed.

Unlike some other REAs, the Midland social worker has no clear or mandated set of responsibilities in the special education referral process. Of course, they attend staffings and analyze home and school situations on request, but their role in special education as well as in the schools is less well understood than some of the other more commonly accepted support services. It is apparent that their services are somewhat underutilized, perhaps because their niche has not been firmly cut in school operations yet; at least this is a reasonable projection from a professional perspective. Some teachers simply do not request social work services like they do, say, psychological services, even though, in many respects, certain aspects of the two services are very similar.

But misperceptions on the part of the community are more interesting, although not at all difficult to understand. There is a stigma attached to social work, an image problem, if you will. It seems that rural communities associate "social work" with "social services." And social services, to the people in those towns, means "welfare", "foster homes," "child abuse"--all those things for poor people.

It is ironic, however, that it is this very connection with social services that makes the social worker the linchpin in a total service approach to special education. The state, as well as the Midland REA, takes a very broad view of education, a view that encompasses the social/emotional factors that surround and engulf the child, the family, the home. The social worker is trained to provide or arrange for the social services that are necessary in some cases to facilitate the educational process. They know "the system": foster care, Title XX, planned parenthood, free lunch programs, financial assistance. These are things that educators rarely have had experience with.

Perhaps the best utilization of the social worker in the Midland area is by the preschool program. Social workers provide grief counseling for parents of young, severely handicapped children, analyze the home situation to allow behavior management programs to be designed (in cooperation with school psychologists), help in locating local fiscal resources, and make the necessary interagency contacts to get parents on, what are referred to as, "state papers," which facilitates obtaining medical services. The special education nurse (discussed below) and the social worker make an effective team; together addressing concerns such as nutrition and family life.

Even though the LEAs and, to some degree, the REA, stress school psychology over social work, demands for social work services are increasing. As special educators, teachers, administrators, parents, and other REA staff have become more aware of social work services, they have requested them more often.

During 1981-82 school year, individual and group counseling was provided for over 600 special education students. Parent counseling was provided to nearly 300 parents and about 100 families. Assessments were conducted for more than 500 students, which were used to provide information to support referrals, placements, and the need for specific support services.

Nine school social workers are assigned on a geographical basis like psychologists and speech/language clincians. Each social worker responds to all referrals and provides all needed social work services in his or her assigned area. One exception to this deployment pattern is the part-time work of some social workers with the preschool program.

As demands for social work services have increased and the REA support services budget has decreased, the staff has used group counseling, parent groups, and priortizing caseloads to meet needs more efficiently.

Speech/Language Clinicians

Like consultants, psychologists, and social workers, the 30 speech clinicians are assigned to the Midland area on a geographical basis. Although most of them are assigned to the area that includes the Lincoln Center and surrounding smaller LEAs, five of the remaining eight satellite offices house at least two clinicians, and two of the remaining three each have one clincian. The Wonder Bay satellite office is staffed with five clinicians.

In addition to the clinical services provided to youngsters, the speech services staff consults with parents, teachers, and other REA staff. They provide informational and instructional programs for school personnel, REA staff, and the community. Like the REA staff as a whole, the speech services staff rarely miss an opportunity to provide school and community presentations to maintain a continued awareness of the needs of children with speech and language disorders.

Everyone wants more speech/languge service. Community awareness campaigns have paid dividends. Parents, who may not have realized the capabilities of nor the importance of speech/language intervention prior to these services being available, now see them as a necessity. And it is not only parents of handicapped students who make these demands; most parents have become aware; screenings, comprehensive evaluations, monitoring and speech/language improvement programs are all in high demand. Although total school enrollment began to decrease after the 1978-79 school year, the demand for speech/language services began to drop slightly only during the current year. In 1978-79, 1,404 children received direct services. The figures for 1979-80 and 1980-81 remained relatively constant, even though enrollment dropped nearly 1,000 students per year over that same period. The direct therapy figures for 1981-82 are 1,350, which is a slight reduction from the previous year. However, during that same time, the number of students receiving speech/language improvement programs increased from 540 to 900.

Clinicians are assigned specific caseloads using a system that accounts for severity of disorders, travel requirements, number of buildings served, and unique caseload circumstances. The system, designed to allow clinicians to program the frequency of intervention based on the severity of the disorder for any given student, was initiated in 1981-82 to improve the quality of services and to make services more equitable and efficient. And as if demand were not high enough, the unit is developing a procedure to identify high risk babies, which will only act to stretch their services even further.

In an effort to meet demands for services, deployment patterns obviously need to be altered on occasion. The only complaint at the building level is that clinicians in some cases change from year to year.

Audiology Services

During the 1981-82 school year the REA's four audiologists and five audiometrists provided hearing screenings (23,900), acoustic analysis of hearing aids, diagnostic follow-up examinations (3,376), medical referrals (795), and evaluations of auditory training systems and hearing aid functioning. Hearing impaired students, difficult-to-test youngsters, and infants are tested in the soundproof testing booths located at the Midland central facility and the Wonder Bay facility. Over 1,000 students were tested in these controlled settings in 1981-82.

Referrals for the various diagnostic testing services come from parents, schools, and physicians. During 1981-82, the age of the youngsters tested ranged from 3 months to 20 years. The audiological capabilities of the Midland REA are quite impressive, given that the equipment and procedures necessary to test infants are relatively recent developments in audiology.

Physical and Occupational Therapy

Two part-time physical therapists (PTs) are employed by the REA to serve the entire Midland area. Prior to the 1979-80 school year, a very limited amount of PT services were contracted for through other agencies. This year the REA employed one part-time PT (about 16 days per month) and contracted individually with another for three days per week. The REA is anxious to hire both PTs on a full-time basis but neither can accommodate that desire; they can command greater compensation through private service. Area hospitals have declined to provide PT services (on a contract basis) because their PTs do not feel prepared to work with children and/or because they do not have available PT staff to do so.

About 150 students were referred for PT services during the 1981-82 school year, up 18 percent over 1980-81 referrals. Of the 150 youngsters, approximately 80 percent qualified to receive services. It appears that even though it's not getting any easier to find PTs to work in the Midland area, there is no problem finding children who need PT services.

To compensate for having fewer PTs than are needed, the unit has adopted an "indirect service" or "consultative" model. Under the model, PTs develop the activity programs for some children and then train aides, parents, and special education teachers to implement them. Approximately half of the students who require PT services receive them in this manner. The PTs then spend their remaining time providing direct services and doing the evaluations and background work (obtaining physicians' prescriptions, gathering medical information, and the like) necessary to develop the programs.

Strategies to deal with the lack of OTs include the contracted services of a part-time OT to serve as a consultant to the REA PTs in providing OT services. PTs also have access to OTs at the state university training hospital who will consult with them over the phone. This same hospital has sent an OT training and consultation team to work with REA staff at the request of the Midland agency.

Itinerant Teachers

Four REA itinerant teachers served 52 of the 79 Midland hearing impaired students while one REA itinerant teacher served all 22 visually impaired youngsters during the 1981-82 school year. Needless to say, itinerant teachers are busy people. Each teacher travels up to 1,500 miles per month in delivering direct and indirect services to students, teachers, and parents.

In general the types of services provided by hearing impaired and visually impaired itinerant teachers are similar and include assessment, eligibility, and placement activities, acquisition of specialized equipment and materials, assistance to classroom teachers, orientation of nonhandicapped children, and assistance in regular classroom modifications.

Itinerant teachers also serve on the preschool intervention teams for those young children who are visually and/or hearing impaired or in cases in which vision and/or hearing problems are secondary handicaps.

Special Education Nurses

Although all of the 15 REAs have special education nurses, the Midland REA deploys its nurses in a unique way. Rather than being assigned only to one center-based program, the Midland nurses usually travel to and provide service in the REA instructional programs of the eight-county area.

Administratively, the special education nurses are assigned to the Hearing Conservation/Education unit. This is logical since, in addition to their regular duties, they provide an array of screening services (hearing, vision, height, weight, blood pressure, scoliosis) and make appropriate medical referrals.

They provide an important link among the child, family, school, and community in relation to health needs and are available for consultation with respect to health/medical information to REA staff, LEA nurses, county nurses, and LEA staff.

Parent education is a major emphasis. Parents were informed through written material and formal presentations on first aid, feeding skills, nutrition, child abuse, genetic syndromes, vestibular stimulation, and communication with the medical community. Perhaps the heaviest involvement of the nurses has been in conjunction with the multidisciplinary preschool program (ages birth to 3). They provide health history interviews, functional assessments of vision and developmental milestones, physical examinations, recommendations for further health care or evaluations, interpretation of health information, parent counseling, and training sessions for parents and REA preschool team members.

In addition to their work with young children, their parents, and the preschool teams during the 1981-82 school year, they participated in staffings and case management activites with other REA special education staff in relation to evaluation and program planning for handicapped students on request. In their overall capacity they serve Midland children from birth to 21 and traveled about 1,000 miles each month during the year.

PRESCHOOL PROGRAMS AND SERVICES

The Midland REA preschool unit offers an array of interrelated, interdisciplinary programs for handicapped children ages 0-7 and their parents. Nineteen preschool staff members work out of the central facility in Lincoln Center as well as each of the special education satellite offices.

The preschool program serves children who are moderately and severely handicapped from birth to age 3 via a home intervention program (which is considered a support service and funded with P.L. 94-142 dollars); at 3, services are continued in one of the five Developmental Learning Centers. Children who are less severely handicapped may continue to receive services if eligible until they are school-age, at which time services continue but are provided through the ordinary special education programs offered by the LEAs and the REA.

The program uses an interdisciplinary model which is based on a child's "hierarchy of needs" approach and uses the services of the entire REA special education support staff: community and social services (social workers), medical (special education nurses), physical and occupational therapy, vision and hearing (audiologists and visually impaired and hearing impaired itinerant teachers), pre-speech/cognition (speech/language clinicians and psychologists). Children who are served in the home receive at least one hour of direct intervention per week, although efforts are underway to adjust the system to provide more or less intervention time to children on the basis of their individual needs. All services are free to Midland parents. Private placements, when they are required, are paid for by the home LEA. The home LEA picks up educational costs (from their weighted enrollment) and the Department of Social Services covers noneducational costs.

Infants (0-2) are not formally identified as "handicapped," rather the label "deferred diagnosis" is used until the child is 2 years of age, at which time he or she is formally identified. Disadvantaged children who may be delayed because of environmental conditions can not be served directly. In these cases, children are referred to Head Start, but are unofficially labeled as "communication handicapped," which allows the REA to make program recommendations, do follow-up, and re-evaluate each year to 6 months. These children are followed closely and, if necessary, are staffed into appropriate services when they reach school age. Of course, disadvantaged children with severe handicaps are labeled accordingly and served in the usual manner.

Home Intervention

Nine home teachers operate out of the REA central office and four of the satellite offices in the Midland area to identify and provide services to children from birth to age 5 and to their parents. The home teachers (B.S. in early childhood education plus 20 semester hours in special education) conduct assessments of cognitive, motor, and social development and, if the child is delayed (and thus eligible for the program), arrange for a comprehensive evaluation (speech/language, psychological, etc.) to be conducted by other REA special education personnel in the home. Based on these results, the home teacher, in conjunction with the other professional staff and the parent, designs an individualized intervention plan. The plan is carried out by the home teacher _and_ the parent during (and in between by the parent) weekly visits _to_ the home.

During the 1981-82 school year, 265 children were screened; 141 received comprehensive evaluations and were served on a regular basis in their homes. Of course, the major goals of the program are to further the development of the child and to educate parents about their child's problem and how to work toward remediating it. Parents are provided with written prescriptions, directions for activities, data recording devices, and materials to use in instruction and are trained how to use them. Each home teacher serves about 15 children per week, traveling between 200 and 300 miles in making his or her appointed rounds. The number of children screened and served has remained relatively constant since the home intervention program was initiated in 1976-77. The REA has managed to educate the Midland area about the value of early intervention; 20 percent of the children served this year were 2 years of age or younger. Home intervention service costs run $1,600 per child per year.

Parent/Infant Teams

An _ad hoc_ team of specialists is assembled for each infant (0-2) in the preschool program depending on his or her individual needs, as well as the needs of the parent. The teams are made up of the parent, the home teacher, and any or all of the special education support staff who have become involved in the child's program (psychologist, social worker, audiologist, PT, nurse, speech/language clinician).

The multidisciplinary teams provide ongoing, in-depth evaluations, programming suggestions, and demonstrations at regularly scheduled sessions held at the central REA office in Lincoln Center or the satellite office in Wonder Bay. Ten infants and their families were served during 1981-82 in this fashion at a cost of $2,300 per child. They attended sessions in which all members of the Parent/Infant Team were available to them for consultation.

In addition to the professional services made available to the parents through the team, parent support groups are formed among those parents who participate in the Parent/Infant Team program. Parents of children who formerly were involved in the program attend the sessions to lend support and encouragement to the parents currently involved in the program (discussed below).

Parent Classes

Parents who are involved in any of the Preschool unit's services are invited to attend parent classes. A series of 2-hour class sessions is held weekly for 8 weeks. Parent classes explore mutual problems of child rearing and promote the idea that "parents are teachers too." Through films, slides, discussions, and demonstrations, parents learn about toys as learning tools, self-concept, speech and language development, motor development, and discipline and behavior modification. This training is also available in a home-study format for parents who cannot attend the formal classes.

Parents take home a different toy each week and are instructed in its use to encourage prescribed parent-child interactions. Upon completion of the eight classes (or home-study course), parents are eligible to check out items from the toy lending library (explained below).

Developmental Learning Centers (DLCs)

There are five DLCs in the Midland area, four operated by the REA and one operated by one of the school districts. Each DLC is staffed with what are called "center-based" teachers (as opposed to home teachers), and is provided with the support services it needs from the ranks of the REA special education support staff. Each of the REA DLCs is alloted one full-time speech/language clincian, while the one LEA DLC has access to speech/language services via the other four DLCs and/or the REA special education support services unit. Each DLC operates from one to four classrooms that serve a maximum of eight students each. The classrooms are staffed with a teacher and an aide.

Originally established and funded by the county boards of health and taken over by the REA, the DLCs serve children from ages 3 to 7 who need more intensive intervention than can be provided in the home. The DLC staff, aided by the support staff necessary for particular cases, conduct formal and informal assessments to determine the nature of the disability and to be able to design appropriate programs of intervention. If the child's disability is such that the DLC is the most appropriate program, the DLC works up an individualized plan and carries it out in-house. In some cases, the DLC may not be the most appropriate facility to serve the child. Here, the DLC coordinates the necessary services with other child care programs.

The five Midland area DLCs served a total of 92 children during the 1981-82 school year. Children with the following handicapping conditions attend the programs: mental disability (35), communication disability (35), physical handicap (12), emotional disability (3), severely handicapped (4), hearing impaired (2), and visual impairment (1). As we have noted, the DLC in Lincoln Center will be moved to an LEA elementary school which was scheduled to close due to enrollment decline (caused by the closing of a meat-packing plant).

Toy Lending Library

In addition to the home- and center-based direct intervention programs, the Midland preschool program provides a toy lending library which contains over 7,000 educational materials appropriate for children from birth to age 6. The main toy lending library is located at the central REA office, with a smaller toy library located at the Wonder Bay satellite. All materials are available for home use; parents earn a library card after they have completed the 8-week parent classes.

Parent Education Materials

Various parent-use materials are available for group or individual use. These materials, for the most part, are prepared by the preschool and support staff (and printed by the LRC, as one might guess) and cover a wide range of "parent as teacher" topics. Materials are also available to guide parents through learning activities they can use at home to foster their child's development. For example, one item is a manual used in the parent classes. It contains over 300 pages of information and step-by-step activities in topics such as creative play, self-concept, behavior modification, motor development, and language development.

Hearing/Speech Services

The hearing conservation program monitors "at risk" preschoolers or those with slight hearing losses to prevent hearing loss and further deterioration. The preschool unit also offers out-patient speech/language therapy services. Children who are at risk, or those who have successfully completed therapy, are monitored. Fifty-five children received these preventative/maintenance services during this school year.

Parent Support Groups and Services

Two parent support groups have been added to the preschool unit's offerings in recent years. The first, Parents Actively Lending Support (PALS) originates with the area Child Abuse Council. The REA and the Department of Social Services are informally involved and the PALS services are used by the REA preschool unit as well as other units when necessary.

Pilot Parents, the second support group program, was adopted by the REA (as a replication site) from its original site in an urban center of a neighboring state. Although the project has since been replicated in 25 cities around the state, the REA is the first site to adapt the model to a rural delivery context. The REA participates in the training of parents of handicapped children (6 weeks, 12-18 hours total). The program provides informational, self-advocacy, and moral support to other parents of handicapped children. The state Developmental Disabilities Council provided the seed money. The program has trained 40 sets of parents in the Midland area over the past 3 years, some driving over 200 miles to participate. The project has caught on and spread to other rural REAs in the state.

The Department of Social Services sponsors a program that provides in-home services to parents of severely handicapped children who are also welfare recipients (Title XX funds). A "family support worker" does household chores to free up parents to be able to spend more time with their children. The preschool unit, naturally, accesses these services to enable parents who are participating in the home intervention program to be able to carry out the intervention program designed for their children.

Because this program has worked so well, the REA is attempting to secure foundation funds to initiate a "respite care/baby sitting" service for Heartland parents who do not qualify for Title XX monies. The only difference is that the REA program will provide baby-sitters who are nurses. The proposal has been verbally approved.

The entire array of preschool services comes under the watchful eye of the Supervisor of Preschool Services. With the help of two preschool consultants, she manages and supports the preschool staff and coordinates the use of support services from other units with the appropriate supervisors. The Preschool Supervisor deploys her staff on a geographical basis throughout the Midland area in response to referrals which come from many sources (the numbers in parentheses are the percentages from each source during 1981-82): parents (27); school personnel (7); private preschools (6); Head Start programs (9); Department of Social Services (17); other REAs (4); medical personnel, including health nurses (9); genetic counseling services (3); Pilot Parents (2); Midland REA personnel (via screenings, roundups, etc.) (7); and the state university training hospital (9). Not the least time-consuming task for the preschool supervisor is the "juggling around that's necessary to get the student placed and figuring how it's going to be paid for."

Parent Participation

Parent involvement in the program can be characterized along two dimensions--severity of handicap and socioeconomic status--which, of course, are related. Parents of severely handicapped children tend to represent all socioeconomic strata, just as severe disabilities tend to be distributed. Milder handicaps, on the other hand, tend to be more prevalent in lower strata, particularly when the disabilities are related to cultural and environmental conditions, like mental retardation.

Parents of severely handicapped preschoolers are very active in the program; they come to training sessions, follow through on suggestions, and, in general, do all that is expected of them. Parents of less severely handicapped children tend to become less involved. Of this latter group of parents, the preschool staff estimates that 20-25 percent are themselves handicapped. In these instances, the staff break down interventions into small steps, print them on postcards, and send them to the parents as reminders and manageable directions for intervention activities.

Of the families who do participate in the preschool program, mothers become involved more often than fathers. However, some siblings join in to help, and during the winter months fathers too become involved. Conversations at support group sessions tend to center on money problems and relationships--marital, family, community. It is not surprising that a very strong bond is formed between parents and the preschool staff, as well as among parents themselves. Parents buy or make presents for the staff and, if one were to attend a support group session, it would not be at all unusual to see plenty of hugging, kissing, and laughing. When the children are present, they are all hugged and kissed by everyone--parents and staff. The scene, if it were not so positive and happy, would surely wet one's eyes, and for the person who tends to be soft-hearted, it does anyway.

Impact of the Preschool Program

It would not be an exaggeration, by any means, to say that the impact of the preschool program has been significant, whether one considers the effects for one child or all children, whether one considers the effects on families, or the schools, the Midland communities, or the taxpayers.

Parents feel the biggest advantage the REA provides is that it draws the necessary people to the area. "It's hard to find caring professionals for so few kids; it takes a region." When they tried to get help from other agencies or the medical community, they most often ran into "walls." It was impossible for them to get information about services like OT and PT, for example.

The parents of preschool children currently in the program are painfully aware of the fact that, in a rural area like this one, their children's lives, as well as their own, would have been significantly different if it were not for the REA. In a panel interview with 10 preschool parents, they all supported the statement, "The preschool program has been a normalizing experience for all of us." One mother made perhaps the key point about having a severely handicapped child in a rural area when she said, "In our town, he'd be the only child who was different." Another mother added that without the preschool program, "I'd be sitting at home waiting; I didn't know what to do without the REA." Two other mothers in the group projected that without the preschool program, "We would have been doing the wrong things with our kids" and "we would have lowered expectations; our kids would manipulate us." They all agreed that the preschool program keeps them motivated and that the parent support group is "essential, it removes guilt."

One should not assume, however, that all parents are equally positive about the preschool program, or, more accurately perhaps, that all parents are as positive about it each and every day. For some parents, satisfaction with the program and the staff varies over time. Some parents want more services for their children, or want differential treatment for them. For example, one mother felt that her child needed more physical therapy than the amount being provided and that the amount of any particular type of service should be based more on the needs of the child. But even in these instances, virtually all parents agree that the impact of the preschool program has been significant. One mother perhaps said it best, "We do feel that the infant program does make a big difference in our lives and it is for the positive, but there are some not so positive days."

Perhaps the greatest impact of the program has been on the Midland communities. Although the attitude toward children who have visible handicaps is "accepting" because, in small towns, everyone knows mom and dad, the tendency is to view the child as a "sad sight" or to "feel sorry" for the parents. One parent in the interview, who was supported by the nods of the other nine, said, "But, I can deal with it because of the parent support program."

When parents take their handicapped children shopping or to social events (which they do religiously), a common reaction they say is, "I can't believe you take him out of the house." On this point, they all agreed with one mother when she said, "A lot is your attitude toward your child. If you project a positive attitude toward your child, the community will also. My good attitude comes from the REA." Another mother added, "The community can watch the child grow up. After a while, they quit asking questions because they know." And not the least of the impact on local residents' attitude toward handicapped children stems from the fact that these children attend school. When your child "goes to school, it makes it okay." Other parents supported one mother's statement that this same situation works to affect the attitudes of "relatives" as well.

One should not assume that the impact of the preschool program has escaped the watchful eye of the more fiscally-minded observer in the Midland area. Indeed, as one interviewee put it, "The preschool emphasis can pay big dividends." And, indeed it has. Of 100 children who were receiving preschool services in 1976-77 and who completed third grade in 1980-81, only 69 were still considered "handicapped" at the start of the 1981-82 school year. Of the 31 students who were no longer considered handicapped, 18 had completed third grade without being identified as handicapped, and 13 were not labeled handicapped but had received some form of supplemental assistance during their first three years of school. In general, 22 of the 100 children moved to less restrictive (less expensive) settings once they entered school.

MIDLAND VOCATIONAL EDUCATION PROGRAMS

During the 1981-82 school year, 132 students were served by the REA's five work experience instructors. The instructors operated out of five REA special education satellite offices. One of the instructors serves in the capacity of Coordinator of Work Experience Instructors.

Work experience instructors have available to them, through the REA's educational services division, the Picture Interest Exploration Survey (PIES) and the Talent Assessment Program (TAP) to assess career/vocational interest and ability in industrial, technical, and service occupations. More in-depth assessments are available from the Assessment Center located at the MCC in Lincoln Center for a fee of $5.00 an hour, which is paid by the student's home LEA. Vocational assessments are conducted using work samples and can range from 2 to 6 days in length. The Assessment Center is a cooperative program funded by the community college, the Midland REA, and a private agency, and receives referrals from the Midland REA (and through the REA, the Midland LEAs), CETA, Department of Correctional Services, Displaced Homemakers, the state job services agency, and the Rehabilitation Branch of the DPI. The community college Special Needs Director works with the Coordinator of the Assessment Center to facilitate the evaluations of special education students.

In addition to the above activities, the work experience instructors organize parent support groups, provide career counseling for handicapped students, develop vocational curriculum, conduct various public relations activities for employers, and provide inservice programs. They also serve on the initial and annual review staffing committees for their students.

State regulations permit students to work part of the school day and to receive pay for that work, which typically ranges from $1.60 to $4.00 per hour. Several agencies contribute money to be used to pay the students as an incentive to employers, although many employers pay the entire wage themselves. In recent years, some employers have started using the Targeted Job Tax Credit to employ handicapped students.

Two closely related programs are Vocational Education for Selected Students (VESS) and Experience Based Career Education (EBCE). The VESS program serves high school special education students who are judged to be ready for a vocational training program. Individualized programs are developed that include any or all of the following areas depending on the needs of the student: vocational skill training, job-seeking skills, social skills, daily living skills, and academic instruction related to a specific occupation. The VESS program differs from the work experience program in that it provides instruction to develop job specific skills, whereas the work experience program trains for general vocational skills. The VESS program includes training for 17 occupational areas including auto mechanics, broadcasting, farm operations, drafting, nurse and teacher aide, and data processing.

The VESS program is a cooperative venture operated by the community college, the REA, and the Midland LEAs. Tuition for student enrollment is paid by the sending LEA. Per pupil costs for the programs are $1,800 and handicapped students are weighted 1.7. Handicapped students can attend the program until age 21 if it has been determined that they require the training VESS offers.

The EBCE program is designed to provide career exploration experiences for learning disabled and mildly mentally retarded students. More than 200 community sites are used to provide observation of and participation in various occupations; these experiences may range in length from 3 to 9 weeks. The students' regular high school curricula are altered to correspond to the occupations they are experiencing. If students complete their academic assignments while participating in the EBCE program, the credits they earn count toward graduation requirements.

The EBCE program, like the services offered through the work experience program, does not train for specific job skills (as does the VESS program) but rather provides exploratory experiences. Both the EBCE program and the work experience program provide the experiences necessary for students to choose an occupation. Once a student has made his or her choice, the VESS program can be used to train for that occupation.

During the 1981-82 school year, 11 Midland LEAs sent a total of 28 secondary special education students to participate in the VESS/EBCE programs. The VESS program offers training in specific occupations in various locations throughout the Heartland area. VESS graduates receive certificates that list specific job skills for which the graduate is certified as competent.

The MCC facility also offers a sheltered workshop which is funded by the county board of supervisors. The move to provide the sheltered workshops was spearheaded by the president of the college whose son needed such a program after high school. In fact, the president's personal situation has played a big part in cementing the strong relationship between the MCC and the REA special education division.

REA RESPONSIBILITY FOR DISTRICT REORGANIZATION

The Midland REA's role in district reorganization entails three tasks. It is required to conduct feasibility studies and surveys for local districts, help LEAs plan reorganization proposals and review and/or modify those proposals before submitting them to the State Superintendent, and to conduct public hearings and assist LEAs in submitting proposals to the electors. It is important to recognize that the REA does not originate reorganization proposals; the locals do. The Midland REA has had the most experience of all 15 REAs in dealing with school district reorganization. It has processed seven proposals since 1975, only two were approved by the voters.

Indeed, most observers believe that school district reorganization is a state level problem which has been delegated to the REAs because the state legislature "won't touch it". As in most other states, consolidation has been and continues to be a political hot potato. It is interesting to note that their role in school district reorganization was not part of the original mandate creating the REAs; it was added by amendment four years after they were in operation. An early problem for the REAs was the perception at the LEA level that they were to push for reorganization. For the most part, however, this perception is held less often by the locals than in the past.

One should not assume that all local communities or districts view the REA as a means to reduce the threat of reorganization. Some districts continue to view the REA as a vehicle for pushing reorganization. In fact, this perception makes these districts uneasy about accepting REA services. The REA is not the only target for these misperceptions, however. In some small districts, locals are more suspicious of the largest district in the county than they are of the REA.

SOME ISSUES OF PARTICULAR CONCERN TO THE REA

Although the Midland REA is certainly an impressive agency, the reader will have surmised from the preceding pages that it is not completely devoid of problems. No doubt the major ones are already apparent. Nevertheless, for ease of reference and for the sake of clarity, they will be briefly described again in this section. Their order of presentation does not necessarily reflect the importance placed upon them by the people of the Midland area. Indeed, it is doubtful if a single priority listing could be devised on which even a majority of stakeholders would agree. Our order of presentation, rather, reflects the research team's subjective judgment about the extent to which the problems are exacerbated by the fact that the Midland area is a rural setting. Thus, the first problems are likely to be found anywhere in substantially the same form as in the Midland context, but as we move down the list, the influence of Midland's rural status is likely to become more and more telling.

Public Law 94-142

There is little doubt that more handicapped children have been identified, served, and served better, since the passage of P.L. 94-142. It is almost as certain that, on its own, Chapter 300 would have accomplished essentially the same results. However, one cannot underestimate the impact of P.L. 94-142 in this state as well as in the Heartland area. Given the downturn in the economy, it is very doubtful that preschool services would have been affordable without P.L. 94-142 dollars. Moreover, we know that P.L. 94-142 made those who otherwise would have taken the state mandate less seriously attend more carefully to its terms. In these ways, the federal mandate has helped.

In other ways, however, P.L. 94-142 has foisted its share of problems on the Midland schools and the REA. There is little doubt that it has caused some unnecessary confusion. Some feel that more time is spent making sure one does not violate its requirements than in living up to its goals. Even the law's most vocal supporters agree that the "red tape" can be overwhelming. Less avid supporters argue that it is ridiculous to expect the bill to work in the smaller, rural Midland LEAs as it does in urban centers. Even DPI officials agree that the regulations accompanying P.L. 94-142 are too specific and, at times, detract from getting the real job accomplished. This is particularly true, they say, in a state like this that has its own special education law and, more importantly, the delivery system and resources to give it "teeth." But even those who see the regulations as burdensome are quick to add that P.L. 94-142 (the statute as opposed to the regulations) is a necessity.

What would happen if P.L. 94-142 were repealed or substantially deregulated? From the state perspective, the nature of continuing action would depend on the health of the state's economy. Under good economic conditions, the state would maintain Chapter 300's current standards. Under poorer economic conditions, there would be pressure to ease requirements somewhat to minimize costs by increasing class size limits, reducing administrative requirements, eliminating nonessential support services, and tightening eligibility criteria. The brunt of the burden would fall on handicapped students and special and regular teachers.

The biggest concern of those who handle these matters at the state level is the impact that repeal or deregulation of P.L. 94-142 would have on preschool programs. The 0-2 age population would be lost outright, and, depending on the extent of the alterations in the federal mandate and the condition of the state's economy, the 3-5 age group would be in serious jeopardy. Parents of preschool handicapped children in the Midland area organized letter writing campaigns to lodge their complaints in Washington, D.C.

We raise the issue of repeal or deregulation only because it was a topic that received considerable attention during this school year, both at the federal level and in the Midland area. Various proposals to deregulate, as well as rumors of a repeal, seemed to be the topics of concern with many people. By the end of the year, no one was certain just what action, if any, would be taken.

The threat of repeal or deregulation represents one concern for the REA in respect to P.L. 94-142. But what is undoubtedly the most serious problem is the amount of time and effort expended to make certain the locals are in compliance with existing regulations. Remember, the REA does not monitor the LEAs per se, the DPI does. But remember, too, that when monitoring is done, the REA and the LEAs are under scrutiny together. The consolidated application procedure (a P.L. 94-142 device) and Chapter 300 make them partners in special education, as it were. Because the local districts, particularly the smallest ones, have a difficult time both in keeping current with the regulations and complying with them, measures have been taken to assure that they do. The REA special education consultants, acting as the director's proxies, work with the administrators in each of their assigned LEAs to help them stay on top of the requirements. But that diversion of effort means that less time and energy are available for the consultants' other duties. Thus, we see that the multiplicity and specificity of requirements has resulted in a shift in the role of the consultant from one of helping teachers to one of helping local administrators, a role displacement of dubious utility.

Regardless of one's feelings toward P.L. 94-142 and its regulations, or Chapter 300 for that matter, there is little doubt in anyone's mind about the unprecedented change in the way handicapped children are educated. But one should not assume that the benefits of these mandates have been all one-sided. In fact, the effects have been felt in many areas of education in the Midland schools. Some regular teachers have realized that techniques that work with problem learners work even better with some of their regular students. Even some of the procedures required by the special education rules have been adopted for use in non-special education settings. For example, some teachers have, on their own, used staffing conferences and written IEPs for talented and gifted students. The vocational instructors at MCC, after revising their curriculum to accommodate handicapped learners, found that it was now more effective with their nonhandicapped students. There has been an increase in individualized instruction for all students in some schools. One principal who administers two buildings, only one of which houses special education programs, commented that he can see a positive difference in his staff in the building with special education programs. In fact, having handicapped students in the building has been a positive growth experience in a majority of the Midland schools. There are other examples, but the point is that P.L. 94-142 and Chapter 300 have had a positive impact on the lives of handicapped students, the specificity of the regulations notwithstanding, and in some respects have begun to have a positive impact on the Midland schools in general.

Paperwork

Heavy regulation is necessarily attended by heavy paperwork. Actually, there are two types of paperwork requirements within the Midland operation, that associated with IEPs and that associated with the LEAs' weighted enrollment count.

The LEAs don't complain much about the IEP paperwork. Regular teachers and principals for the most part have been relieved of this task by the REA special education consultants, who help the local special education teachers complete of the IEP and take responsibility for typing, duplicating, and distributing it. The special education teachers do the bulk of the writing. But while other REA support staff have minimal paperwork duties associated with the IEP *per se*, the paperwork related to evaluation reports can become overwhelming. For example, some speech clinicians estimate that they spend 50 percent of their time hunched over paperwork of one kind or another. Of course, not all of the paperwork stems from IEPs or evaluations; some of it emanates from the DPI and some from more traditional sources.

In addition to their role in the paper flow of the IEP process, the consultants spend a great deal of time with local administrators processing weighted enrollment counts. As we have noted, some have characterized their role in this respect as doing the "leg work." Naturally, LEA administrators see the consultant as a tremendous help. And while these services represent significant savings for the LEAs, they are not cheap in terms of their effects on the quality of the LEA special education programs.

In all, about 80 percent of the special education consultants' time has been absorbed by the activities related to compliance and accounting. This has had predictable effects on all programs, but especially on the quality of the LEA special education programs for mildly handicapped students, since the REA's link to these programs is the consultant.

LEA Programs for Mildly Handicapped Students

A variety of concerns can be identified in the Midland REA and its associated LEAs that relate to the programs being offered for mildly handicapped students--those students usually mainstreamed--for whom the interaction between special and regular teachers (and other personnel) is critical.

The first of these problems might be characterized as a communications impasse. All of the Midland LEAs provide their own programs for mildly handicapped students, offering LD and/or multicategorical resource programs (LD, EMH, and ED students); some provide SCIN classrooms as well. Some of these programs pre-date the REA, especially in Richland County and the three counties that were served by the Tri-County Special Education Cooperative. In most of the smaller LEAs that were not part of these earlier arrangements, however, local experience with special education programming coincides with the existence of the REA.

Because these are local programs, the LEAs tend not to seek assistance from the REA; conversely, because the REA wishes to encourage and reinforce local ownership, it is reluctant to intervene. However, many LEA special teachers want help from the REA, particularly in reaching regular teachers. They are reluctant to approach the regular teachers about classroom accommodations for handicapped students because, as some report, they feel the regular teachers are already overburdened and the last thing they want to hear is a request for some additional effort. Moreover, special teachers are often reluctant to approach regular teachers about handicapped students because they know that many regular teachers see students who have problems in their classrooms as a sign of personal failure. The result: a communications breakdown.

A second problem relating to the mildly handicapped student is the lack of involvement of regular teachers in carrying out the provisions of the IEP. Regular teacher involvement often ends when the staffing conference is completed and the IEP document has been delivered. In these cases, the regular teacher goes on about the business of running the classroom just as before, leaving the IEP to the special teacher with minimal coordination between the special and the regular class. Nearly all of the Midland regular teachers received very little training relative to handicapped students in their teacher education programs, because their training antedated the passage of P.L. 94-142 or because of lapses in teacher training curricula currently available (more of that below). Coordination between regular and special education is weakest in buildings in which there is less than adequate administrative support; without it, the special teacher often feels helpless and retreats to the resource room "bastion."

A third problem relating to the mildly handicapped is the resentment built up by the regular teacher on being asked to assume this additional burden. "We just get the problems," was the way one interviewee characterized the sentiment of some of her fellow classroom teachers. And while this feeling is by no means universal, it is safe to say that there are regular teachers in the Midland who area share this sentiment.

There are multiple reasons for this resentment. Regular teachers often feel that their input carries little weight with special educators, particularly in staffings, for example. But the surest basis for resentment are the giving of grades and the adaptation of curriculum, particularly at the secondary level. One administrator said that as far as his teachers are concerned, "The curriculum is sacred, not to be tampered with by God or anyone." There is no standard approach to assigning grades to handicapped students who attend regular classes. While informal policies are sometimes worked out, there have been occasions in which teachers were reluctant to assign grades higher than "C" to handicapped students even though they had earned them according to the agreed-upon rules. As one might expect, debate centers on fairness to the handicapped student, to the curriculum, and to the standards of the school. The latter concerns exacerbate the problem at junior and senior high school levels.

Another form of resentment also centers on fairness. "What about the average student?" some teachers ask. Others are concerned that talented and gifted students rarely get as much attention from the system as do the handicapped. Further, this resentment goes beyond the building and LEA level all the way to the REA. Remember, in the minds of many Midland teachers, the REA is special education. Moreover, resentment is heightened when they see so much money go to the REA--the "flow-through" problem. Even top administrators at the REA admit, "If you're not involved in special education, you have reason to wonder." The REA is painfully aware of its inability to alter significantly teachers' perceptions of the agency and of special education.

There are fortunately, some ameliorating forces in the situation that can be enlisted. Perhaps the biggest ally is time. Resource teachers in some LEAs report that acceptance improves even after only one year following the introduction of a new program, if the new program is perceived as a quality operation. Some principals, on the other hand, believe that it takes more time: "Some regular staff need to be sold on special education." But even that task becomes easier with the passage of time. And certainly, time has been the key factor when one considers the history of acceptance of special education across the Midland LEAs. The larger towns have been at it longer, and, if a year can make a difference, the experiences that the larger towns had via the two joint-county arrangements have given them a head start. Although the two systems--special education and regular education --are not integrated as one system in any of the Midland LEAs, they are more likely to be farther toward that end in the larger--more experienced--towns. The time clock is definitely on the side of increasing success.

Another factor that seems to be working for a more meaningful synergism between regular and special education is administrative support. While the REA staff may feel that they have not had a satisfactory level of impact on regular teachers, they do feel considerable success with principals. Special education support staff who have occasion to visit many districts note that administrators' philosophies about special education certainly do vary from building to building, and especially between elementary and secondary level principals. The former are almost always characterized by interviewees as child-oriented and the latter as either subject- or management-oriented. But in all events, there is literally total agreement among regular teachers, special teachers, parents, and REA staff, that where special education works well, the building principal "paved the way," "set the pace," "won over the staff." Principals tend to use their own language to describe their role: "serve as a buffer," "stamp out fires." But whatever the language, the message is loud and clear: principals can make a difference.

A third factor that makes a difference relates to the personalities of the special education teachers and staff themselves: the extent to which they can effectively "sell" themselves and their programs. They need to project a feeling of pride in what they are doing. Regular teachers stress that the special education teacher must have qualities that command respect; they must be viewed as competent, but willing to admit to being wrong when they make mistakes. Administrators agree that the personality of the special education teacher is critical; one principal noted that in his building, special education is no longer a "dumping ground" because the regular teaching staff has come to respect special education teachers. Principals support the idea that the special teachers must be willing to take the initiative in creating good relations. A panel of six principals summarized the characteristics of a good special education teacher: a person who works well with regular teachers, who is patient, understanding, puts in extra hours, shares authority, is a co-worker, and doesn't act like a director over regular teachers.

These attributes and skills are apparently critical not only for resource teachers but also for special teachers who man self-contained classrooms. The behaviors that seem to impress administrators about all special teachers, including those who do not have shared responsibilities with building teachers, are associated with a willingness to take on and share in regular building responsibilities. "The MDT teacher is exceptional--she'll handle discipline in the hall," is a typical comment.

Thus we see both crisis and opportunity in the programs that LEAs offer for mildly handicapped youngsters. The natural inclination of LEAs for autonomy and of the REA to encourage feelings of local ownership militate against easy communication. It is difficult to carve out a meaningful role for the regular teacher in carrying out the provisions of IEPs. Regular classroom teachers build up resentment against special youngsters, resentment that hinges on factors such as their inadequate preparation, concerns over control over grading and curriculum, and issues of fairness. But as usual, there are forces in the situation that can be enlisted to overcome, or at least ameliorate, these problems. Time, administrative support, and the strong personalities of most of the special teachers interact to increase acceptance.

Teacher Preservice and Inservice Education

Some schools or colleges of education have attempted to alter their training curricula to reflect the added demands placed upon regular and special teachers by P.L. 94-142. Most, however, have not. The rift between regular education and special education that one sees at the building level has its roots on the college campus. The same resentment that one can sense in the public schools is as apparent in the "hallowed halls."

One should not assume that all of the blame falls on the side of regular education, however. Special education, with its perhaps overreliance on traditional service delivery models, and with the stake faculty have in their particular categorical areas of exceptionality, is as much to blame as regular education. Regular and special educators cannot seem to work together in the schools because their teachers at the college level are just as estranged. One who is familiar with the workings of schools of education should not be surprised in the least with the current state of the art in the education of mildly handicapped children. Mainstreaming, least restrictive environment, P.L. 94-142, Chapter 300--whatever one calls it--requires that regular and special educators work together. Until they can do this in colleges of education, no one should expect great strides in this direction in the public schools.

Of course, the most logical solution to meet these training needs is inservice education. However, inservice teacher education is not in much better shape than preservice education. Here, the problems are even less well understood. Many authorities, as well as inservice education participants, believe that training teachers in the field is the weakest aspect of teacher education. Most administrators expect teachers to be finished products and thus do not place great importance on inservice education. Further, negotiators for teacher contracts have made a minimal number of inservice days one of their demands. Who can blame them? Inservice teacher education has been so neglected that it amounts to little more than a ritual that teachers must endure.

And while nearly everyone agrees that effective inservice education for regular and special education teachers (particularly teachers of mildly handicapped students) is sorely needed, there are a number of barriers that get in the way. Although Midland LEAs are willing to permit their regular teachers to attend inservice sessions on special education, the training that is conducted has very little impact because, as some put it, most regular teachers do not have a "perceived need" to change their behavior. This lack of motivation is the essence of the problem in delivering inservice education. If one has no interest in the content and believes that it is of no consequence to him or her, inservice education simply becomes one more thing that has to be done rather than being a learning experience. REA consultants who have presented programs to regular teachers in some districts believe that they wasted their time for just this reason. There is no "need" to attend to the content since there is no reason to change one's behavior or to do anything differently in the future. These same consultants feel that an all out effort to provide inservice training must await the time when regular teachers feel that there is some need to learn; this change in teacher perspective will require a change in administrative philosophy toward inservice education in general and special education in particular.

In some cases, LEA special education teachers are reluctant to approach administrators or regular teachers to suggest the need for inservice training. They are reluctant to suggest that standard practice is ineffective or wrong. So, here again, the LEA special education teacher retreats to the special classroom and tries to do the best he or she can for the student--forced to work at the student level rather than the system level in attempting to make a change.

The REA has been thwarted in its attempts to provide inservice programs for the Midland LEAs because each district works from a different schedule--different times of the day, different numbers of days allotted to inservice training each year, and so on. In general, and to say the least, inservice education has not been a viable vehicle for staff development in the Midland area. In some of the smaller districts, regular teachers have never had inservice training on matters related to their role in special education.

The complete reverse of this situation is apparent with respect to the REA special education teachers who work with moderately and severely handicapped students in self-contained settings. One is immediately impressed with the quality and character of the REA teachers. Their teacher training programs have served them well. This is not unexpected, however, since special education teacher training programs have been in the business of training self-contained classroom teachers for a considerable amount of time. In fact, advances in some areas, like severe and profound handicaps and infant stimulation, have progressed quite far. The REA teachers apply their skills quite remarkably with the children they serve.

Furthermore, each teacher and handicapped child is bolstered by an incredible array of support services. Rarely do moderately/severely handicapped children have a single handicap. Rather, their conditions usually require an interdisciplinary apporach. In this regard, the conditions for REA teachers to make the most possible gains with their charges could not be more facilitative. The support services and staff are, like the teachers they support, of high caliber and character. The work ethic and commitment to handicapped children is immediately apparent and impressive.

Of course, having all these services is only part of what is needed. To make it all work to the benefit of the child takes a team effort. Teachers and support staff must be able to communicate and work cooperatively. The boundaries are clear yet flexible; everyone has input; everyone has an opinion. Personalities give and take as the staff keep their ultimate goal in mind: the child's development.

But it is not just that these people had adequate preservice training. They, too, were unfinished products when they came to Midland. They have grown and developed with the careful nurturance of the REA. Each has an allowance for travel to conferences and workshops throughout the year. And, in some cases, when they present papers and training sessions at these events, as many do, the REA pays for their entire trip, over and above their typical allowance.

The REA provides these amenities partly as a recruitment device (see below) but more importantly, they are interested in each person's professional growth. And it has paid off for the REA and, most of all, for the children of the Midland area.

And so we see that while the REA teachers are confident special educators--self-assured that they know what they are doing and that they are having an impact on the lives of the children they serve--the LEA special education teachers, for the most part, are insecure and anxious about their role in special education. This is to be expected because very few special education teacher trainers understand the role of the teacher of mildly handicapped students under the P.L. 94-142 mandate. Moreover, even the best of these special teachers are thwarted when they confront regular education in school buildings in which there is little or no understanding of them or their role. Just as in the education of more severely handicapped students, it takes a team effort. If the regular education staff in a building does not understand or is not led to understand their part, there is very little chance for a quality program for mildly handicapped students. Where this is true in Midland, one can predict the result.

Declining Enrollments

One-third of the Midland LEAs currently are in a "zero growth" state. Although enrollment is expected to go up in three or four years, it has declined by about three percent each year for the past seven years. Total Midland enrollment has dropped by about 1,000 students per year over this period. The 1980 census figures indicated a 5 percent drop in the total population of the area, this representing a 20-year turnaround in what had been modest growth. Furthermore, occasional plant closings have caused targeted population drops in some areas. The closing of a meat packing plant in Lincoln Center, for example, meant the loss of 750 jobs and produced a 50 percent drop in the enrollment of one elementary school.

The REA has been affected negatively by declining enrollments as well. We previously have noted the image problem created over time as LEA budgets declined because of lower enrollments while the REA budget continued to increase. That problem was corrected by legislative action which changed the way REA support service dollars are generated. But, while the modification, which amounted to basing support services revenues on student enrollment and allowing only the standard LEA allowable growth factor, solved the image problem, it created new difficulties for the REA.

The problem with basing support service revenues on enrollment is that demands for support services do not decrease as enrollment drops. In effect, the REA support services budget has decreased while demand has remained constant. Moreover, state cuts in the allowable growth factor resulted in the loss of seven support positions this year. What all this means for the REA is that they must serve a relatively stable and, in some cases, increasing number of students, with fewer support staff.

In an urban area, lower enrollments usually result in decreasing demand for services, but when fewer support staff must travel the same distances to deliver their services, windshield time eats away at the time they spend with their students. The result is that students receive fewer support services.

Determining Appropriate Placements for Mildly Handicapped Students

As we have seen, it is not possible for individual LEAs to provide each type of program that might be required by a student. This is true primarily for low-incidence populations (e.g., severely/multiply handicapped, hearing impaired) for whom the REA provides programs, but it is also true of programs for more prevalent disability types such as LD and EMH. In these cases, districts have two options: they can provide their own programs or send the student(s) to a neighboring LEA.

But it is not always possible for the smallest Midland LEAs to offer categorical programs. Sometimes it is not even within their fiscal means to send these students to a categorical program in another LEA because transportation costs are prohibitive. The solution of choice in the Midland area has been to provide multicategorical programs, which serve a combination of LD, EMH, and, to a lesser degree, ED students. In fact, the rate of growth for these programs has consistently surpassed the rate for LD resource programs. During the 1981-82 school year more than 60 percent of all resource programs are multi-categorical, with the remaining resource programs serving LD students exclusively.

This trend toward more multi-categorical programs is consistent with a national trend in rural special education. The idea is not a new one. The basic assumption which supports their use is that labels are artificial for instructional purposes and that the educational and social needs of mildly handicapped students are more alike than different. The fact that state multi-categorical certification requires only two areas of categorical certification (any two of LD, EMH, ED) attests to an orientation regarding similarity across categories.

The effects of multi-categorical resource programs have been different for each of the three categories. Learning disabled students traditionally have been served in resource settings; there is nothing new here for them except that they are now more likely to have classmates who have been "labeled" as something other than LD. The real difference, of course, is for students who have been labeled EMH and ED. Traditionally, these students have been served in settings which are more restrictive than resource rooms. The multi-categorical room thus provides the opportunity for more contact with the regular program. Self-contained classes for EMH students are very rare in the Midland area. Indeed, only 1 of the 36 smaller LEAs staffs such a class, while 6 of the same group of LEAs offer EMH SCIN classes. Twenty-nine of these LEAs, however, provide multi-categorical programs which now serve EMH students. Three of the medium-size LEAs offer self-contained EMH programs as does the Lincoln Center LEA. In these larger cities, the EMH SCIN model is used extensively, as is the multi-categorical model. In these districts, a continuum from self-contained to SCIN to multi-categorical programs has been created for EMH students. And students do move along the continuum. In effect, and regardless of the motivation, Midland's EMH students appear to have moved closer to the mainstream of public education. Approximately 57 percent of the EMH students are served in multi-categorical resource rooms, 40 percent in SCIN classes, and 3 percent in self-contained rooms. Indeed, one of the primary motivations behind P.L. 94-142 was to reduce the segregation of handicapped students, particularly EMH students.

The impact of multi-categorical programs has been felt by ED students and their parents, too. Tables 12 and 13 illustrate that there are very few ED programs in the Midland area, and those that do exist are self-contained and REA-operated (except for those in Fort Dodge). This pattern is not unusual. Students who can be properly identified as ED are far less prevalent than either LD or EMH students; just how to serve them best remains a persistent problem in the nation and this state.

Approximately 25 percent of all mild ED students are served in multi-categorical resource rooms. One would find one or two mild ED students in each of the Midland's multi-categorical programs. The remaining mild ED students are served in regular classes with supplemental assistance provided to classroom teachers and/or parents or in self-contained programs in the home LEA if such programs exist. Where they do not exist, a choice is made--place the student in a multi-categorical program or send him or her to a self-contained program in another district. Most often, however, placement in self-contained ED programs is reserved for the relatively severe cases.

It would appear that the rule exception procedure may be working to the advantage of mildly handicapped special education students. Rather than pre-judging students by assigning a permanent label and program, the rule exception forces trial placements under closer scrutiny, allows the student to remain in the home LEA, coincides with parents' wishes more often, results in a less restrictive program placement in virtually all cases, and provides for altering the placement (transfer to a more restrictive setting) if things don't work out. And remember that in about half of the cases this less restrictive placement becomes the placement of choice. The key issue here is that many students end up being served adequately in programs that are less restrictive than the ones recommended by the IEP committee. On one hand, this is a very positive situation in that less restrictive placements are possible on a trial placement basis because of the flexibility built into the system. On the other hand, however, one must question the ability of placement committees to make appropriate placement decisions. These data indicate that in about half of the cases the decision is for an overly restrictive placement. One must wonder about other children who have been placed in programs without trial placements in less restrictive settings. Are their current placements too restrictive? Could some of them be placed in less restrictive programs? In any event, there seems to be little doubt that the notion of trial placements in less restrictive settings is an administrative option that serves well the best interests of students.

Another key issue is, of course, whether it is better to place a child in a program which is closer to home but may be less diagnostically appropriate, or to place him or her in a program which is in another school district but may be more diagnostically appropriate. An even less clear, but related, distinction centers on whether social or academic goals should be the primary concern in programming for students who have disabilities.

As we have noted above, in the final analysis, the appropriateness of special education programs that require integration into regular classrooms depends on what one might refer to as "building-climate." Is the administrator supportive of the program and the special teacher? Are the regular teachers aware of their role in the integration process?

Can the special teacher communicate with and make recommendations to the regular teachers? Do the regular teachers respect the special teacher and program? The type of program appears to be less important than building climate. Thus, when one wrestles with the issue of rule exceptions that keep students in the home LEA (whether it's to save money or to satisfy parents), the key consideration is the particular program under consideration and not a program type. Of course, this approach does not offer a total solution to whether it would be better to keep the student in the home LEA or send him or her to another one, but in the Midland area one would err to select a program solely on the basis of type or proximity.

The Largest Midland LEA

Historically, relations between the REAs statewide and the largest LEAs within them have been the poorest. The central issue is this: large LEAs have the student population to generate the money to meet all of their special education needs and, thus, do not really need the REAs.[1] The large LEAs did not (and probably could not) oppose the REA legislation because, after all, SF 2001 created not only the REAs but also the funding scheme. The state's 22 largest cities have banned together to force the REAs to treat them differently from the smaller and more rural districts. And, in fact, some of the largest cities do maintain special relationships with their REAs'; the state's largest city has operated apart from its REA from the start. The most recent thrust is a proposal that would allow each of the 22 LEAs to act as intermediate units. However, support for the proposal has not been forthcoming from the DPI. The fear is that such action will "eat away at the REA concept." Moreover, the DPI Division of Special Education would, under the proposal, have to deal with 37 applications and monitor 37 units rather than 15.

Actually, the flexibility exists in Chapter 300 to allow the largest cities to maintain their own special education programs under contract, but the state view is that REA directors of special education do not want to relinquish the power. State officials also feel that, since most of the current directors are former directors of joint county special education units (as is the Midland director), they are accustomed to serving all districts in a region, and they have failed to recognize that the larger LEAs require different treatment. Although this latter perception may hold statewide, it appears to fail when one considers the relationship between the Midland REA and the Lincoln Center LEA. Although it is quite possible that Lincoln Center could meet the mandate at some minimal level, it most likely could not provide the range nor the quality of services it now provides through its association with the REA.

Whether or not the move to withdraw the 22 largest LEAs from the REA network will amount to more than a proposal remains to be seen. The potential loss to the Midland REA would be substantial if Lincoln Center were to pull out. The most serious impact of course would be the loss in support service dollars since the generation of those funds currently is based on student enrollment. If the REA were to lose those dollars, it would undoubtedly have to curtail some support services to the smaller LEAs.

---

[1] In nine of the 15 REAs, over one-third of the total student enrollment is concentrated in the largest LEA.

Finding and Keeping Quality Personnel

The REA does not have the problems finding and keeping personnel that many other rural areas have. There are several good reasons for this which relate to the agency itself as well as to the area and state. The state and region attract personnel because of their reputation for quality schools and a wholesome life. Another positive factor is the agency's location in Lincoln Center. REA staff are willing to work in more isolated areas because the unattractiveness of the isolation (particularly for single persons who are not originally from rural areas) is minimized by their association with the REA. Some staff tend to relate to Lincoln Center as their home base.

Although most REA special education instructional staff are not paid according to higher salary schedule than LEA regular and special education staff (those that are paid more have not felt resentment from their LEA counterparts) and, in fact, are paid $900 less as starting teachers than those of Lincoln Center, the REA provides each staff member with a handsome professional development stipend. Staff members are encouraged and financially supported to attend one national conference each year and to become active professionally through writing and presenting papers at professional meetings. In a limited number of cases more stipend money is provided for staff members who present papers. With these incentives to offer, the director and his staff can be more selective in hiring and do, in fact, allow positions to go unfilled when they can't find the right person. They know what they are looking for and stick to their game plan.

Of course, these same assets and strategies serve to keep staff as well as to attract them. However, "burn-out" is not unheard of in the REA. Home intervention teachers, for example, are particularly prone to become discouraged because of travel demands and dealing with what often appear to be slow rates of progress in their clients. The REA is sensitive to these pressures and is quite comprehensive in its efforts to study and combat attrition. The results of REA conducted exit-interviews with personnel who have resigned for various reasons point to a supportive administration and the quality of the REA operation as the key factors in staff longevity. Some staff say that the REA special education program reflects their value system, a construction which supports the director's comment regarding recruitment: "We know how to pick them." If one recruits well, retention becomes much less a problem.

Although the REA has fewer concerns in this regard than most rural agencies, it is not devoid of problems. By far, the major problem is finding physical and occupational therapists who are able and willing to work with young children and in school settings. Further, both PTs and OTs typically can command more money in the private sector. And while the REA has been able to keep two part-time PTs on staff for two years, the situation is more desperate for OTs.

The special education division has never been able to hire a full-time, or even a part-time, OT as a regular REA staff member, although it did contract for part-time OT consultative services during the 1981-82 year. A major goal has been and remains the recruitment of at least two OTs (the REA maintains two OT positions in the budget), but even extensive recruitment efforts have been unsuccessful. For example, in 1980-81 all university and college training programs in the country were contacted twice, all State Occupational Therapy Association presidents and placement chairpersons were sent recruitment information to disseminate to their members, a recruitment ad was placed in all State Association newsletters, and an individual letter was sent to the 1,600 individuals then registered as OTs in the eight neighboring states. All this produced six potential interviewees; two cancelled, four were interviewed, three were offered positions, none accepted. The reasons for not accepting varied; as new graduates, none wanted to work without other more experienced OTs for support and direction; some were deterred by the traveling; most felt they lacked sufficient training to work with very young children or children in a school setting. This latter position is consistent with the situation state-wide; university training programs are not training OTs to work in school settings. And the situation is not getting better.

A strategy under consideration at the state level involves the use of certified occupational therapy aides (COTA). This option, however, has created controversy among OT professionals. Their concern centers on the considerations of using less than fully-certified OTs to provide OT services. It is not only the concerns raised by OTs that have kept the COTA option out of reach of the REAs; the DPI is concerned that REA directors of special education will overuse COTAs.

The problem of not enough OTs is not universal among the REAs, however. Some manage to attract the precious few who are willing and able to work in educational settings (primarily REAs closer to large cities and situations which the OT's spouse works in the region). An obvious solution then would be for the Midland REA to contract with a proximate REA for OT services; good idea, it has been tried, but it didn't work. One of the Midland's neighboring REAs actually has six OTs, but they "couldn't/wouldn't" share.

The situation described above, of course, is not unique. It reflects the state of affairs on the national level. Another national issue related to PT/OT is: who should pay for them? The debate centers not on whether these services are needed but rather on whether they are "educational" services and thus whether education agencies are responsible for providing them.

This second aspect of the national debate seems moot in the Midland area since PT/OT are viewed as simply one more REA special education service. However, that does not mean that the REA or the state is not sensitive to the issue. Even though the notion that education agencies should pay only for educational services is to them an acceptable argument, their concern then is the lack of criteria to make that decision possible.

The Midland PT/OT staff add objectives to the IEPs of youngsters who require their services which are educationally-relevant; they are presented in educational terms, more for the benefit of regular and special teachers then to satisfy any claim that PT/OT has overstepped its bounds, however. That's not the issue here.

The lack of available PT and OT professionals in the area is by far the major concern for the Midland area. And it has and will for the forseeable future take its toll. The current staff must prioritize caseloads; more time is spent with younger children and, in general, children who show the most potential.

Finally, the recruitment and retention of LEA special education staff is subject to the problems one typically finds in rural areas. Teachers, predominantly females, are reluctant to move to the smaller LEAs, particularly if they are not from the area or do not have a small town background. Local administrators are thus forced to take what they can get. This does not mean that all LEA special teachers are less than qualified, but it does mean that the likelihood of finding an inexperienced teacher in the smaller LEAs is much greater. And we know from previous discussions that there is much more to the job than teaching children. Extensive work with regular teachers is involved, and much of this work involves efforts to change standard classroom procedures to accommodate the handicapped learner. It is in this regard that many young, inexperienced special education teachers fall short. It is most difficult for these teachers to have an impact on a seasoned regular staff. We have already noted that, once hired, the special education teacher has little chance to grow on the job. Psychological isolation from the rest of the staff can take its toll and render the teacher helpless in any regard except to act as a tutor to enable the student to keep up in the regular class. One must wonder if this is healthy for the teacher and appropriate for the student; both can become isolated from the regular program.

Special Education Funding

We have discussed at some length the state system for funding general and special education programs. And we have seen that a special education finance formula is more than a series of algorithms; it not only computes financial resources available to districts from the state but also conveys important state policy choices about how handicapped students shall be educated.

The following sections discuss various aspects of the funding scheme and attempt to draw out the inherent policy positions which shaped them. We will attempt to uncover evidence which may be used to assess how well the system works in general, as well as how well it works for the Midland area. We will be particularly interested in the ways in which the ruralness of the Midland area affects the equity of the system.

School Foundation Plan

The state aid formulas used in most states have been in use for quite some time. They have become less effective as economic conditions and school enrollments have fluctuated. Typically, adjustments are made by fine-tuning or "patching up," but these adjustments do not always solve problems and may, in fact, cause others, since the results of fine-tuning are not always predictable and, in particular, because adjustments often affect districts differentially.

Although the state foundation plan used here is relatively new (totally revamped in 1972), it suffers from problems created by the dramatic change in economic conditions since 1975, as well as from the unprecedented decline in student enrollment over that same period. The plan worked well when enrollments were increasing but now, with declining enrollments, it has had to be "doctored up" on occasion. Eventually, it will have to be changed rather completely to reflect more closely current and projected conditions.

Two recent refinements of the foundation plan are most notable. First, recall that the plan sets the foundation level at 77 percent of the state average cost per pupil. This is the level up to which the state will reimburse local districts after the amount raised from the uniform property tax levy has been determined for general and special education costs. Recently, however, this level has been fine-tuned by setting reimbursement at 77 percent of the lowest state cost per pupil figure. The second refinement is related to the percent of allowable growth by which the state permits districts' budgets to increase. Whereas this amount was formerly based totally on the consumer price index, the state has had to devise a new base for the calculation which, in effect, has reduced real allowable growth. The new base includes the rate of increase in state revenues as part of the calculation which thus ties allowable growth to the health of the state economy. As the state economy has worsened of late, reductions in the allowable growth rate (calculated under the revised formula) have resulted.

Naturally, these adjustments have caused problems for local districts. Money has become tighter and local property taxes have increased to the breaking point. It's not difficult to understand how resentment toward the REAs and special education could build up under such conditions, since those budgets continued to increase over this same period. And although a resentment toward expanding special education budgets is certainly a political problem that warrants serious concern, the changes in the way special education support service dollars are generated (which were made, in part, in response to this resentment) can amount to an even greater danger (support service dollars are now tied to student enrollment and the state authorized allowable growth rate).

Further, special education instructional revenues are not immune from adjustments in the state foundation plan. Although the weighting plan helps to maintain the level of these funds relative to expenditures for regular education, a lowered allowable growth rate means that districts receive fewer special education instructional dollars.

Special Education Funding Formula

Although the types of special education funding arrangements used across the country can be classified into five or six basic formula types, virtually every state adds its own twist, making an accurate characterization difficult. The system used in this state can be classified as a "pupil weighting system."

Pupil weighting systems have several clear advantages over other types of arrangements: the entire range of student needs can be accommodated in a single formula; high compatibility exists with general state aid formulas; there is a reduction of budgeting in-fighting among education interest groups because each group's relative share is fixed in advance; and adjustment for the effects of inflation is easy, particularly if average cost per regular education pupil is used as a base. However, pupil weighting systems are not without their share of disadvantages.

Pupil weighting schemes can be extremely complex, particularly if they include many weights and involve the calculation of complex full-time equivalent student counts. This state's weighting scheme avoids this short-coming by using only three weights and does not involve calculating full-time equivalents.

Three additional potential disadvantages of weighting formulas are eliminated by the weighting scheme used here. The first two problems created by weighting systems relate to misclassifications of handicapped students and placement in more restrictive settings than are necessary. Weighting schemes create incentives for placing students in higher reimbursement categories (more restrictive settings). This problem is addressed here, however, because the director of special education assigns weights to all handicapped students in the REA area, not local districts. And, as we have seen, when transportation costs are considered, the incentive in the Midland region is to assign lower weights so that students can be placed in the home district. Further, weighting formulas generally require student labeling, which can be stigmatizing. This state reduces this effect by labeling placements (e.g., special class with integration) rather than conditions (e.g., educable mentally handicapped).

Pupil weighting often limits small districts from offering their own programs for small numbers of handicapped students (the weighed-generated revenues don't always add up to the cost of providing a program in these districts). In these cases, districts must join together to offer interdistrict programs. And, although this option is available to the districts of this state as well as the option of having the REA provide the programs, we have seen that inter-district and LEA-REA programs introduce their own special types of problems.

Weighting formulas are advantageous for states because they are fairly accurate in predicting statewide costs. However, because individual districts are faced with changing costs (students move in and out, students are pulled out of interdistrict programs for various reasons, and so on) and have varying general per pupil costs, weighting formulas are far less predictable at the local level. This state's mechanism to deal with LEA special education budget deficits (SBRC), although in the past adequate, has become less attractive since LEAs currently have only the option of raising local taxes to make up deficits.

Finally, some weighting formulas are administratively burdensome because they require student-level record keeping (fairly detailed accounting of student's time in regular and special programs). Although the system used here does not require extensive accounting, it does require enough to divert significant time from program matters to accounting matters. We have seen its impact on the Midland LEA program for mildly handicapped students.

The DPI believes that an effective special education funding plan requires three key elements. It is satisfied with the first element: the weighting plan. The weights have been accurate. They were a little high to start with (1.8, 2.2, 4.4), but setting them at this level was considered necessary to account for program start-up costs. They have since been adjusted downward to reflect real costs more accurately and, moreover, there is a built-in adjustment mechanism to review and adjust weights on a yearly basis, i.e., the SBRC. The second element, when handicapped students are counted, was fine-tuned once (changed from September to December 1) but needed further adjustment. Because it could take more than a year for LEAs to be reimbursed for students who received services but were not enrolled in the district until after the December 1 date, the DPI instituted a system this year (1981-82) in which an LEA could use its current December 1 count or its previous year's December 1 count (whichever is greater) for reimbursement purposes. This adjustment will purportedly reduce the lag time to one semester.

The third element necessary to tune up the system is one that is totally lacking at this time. The SBRC, as we have discussed, has only the option of allowing LEAs to raise local property taxes to recoup their special education instructional budget deficits. Further the SBRC can only reduce state aid while allowing districts to reduce property taxes to adjust for special education balances; the SBRC cannot recoup these excess monies directly. To deal with the problem, the DPI has proposed a system of "zeroing out" the state aid portion of LEA special education instructional budgets at the end of each school year by creating a fund into which that portion of all LEA special education balances which was allocated by the state would be collected and from which LEA special education deficits would be paid. After all, the monies are out there; they are simply not in the right places. This proposal, too, is pending. The state Special Education Division feels that, with these proposed refinements, they will have a nearly perfect funding system. Sounds good, but it remains to be seen whether the proposals will be accepted.

The budgeting refinements discussed above, of course, deal only with funds for special education instructional programs. The system for funding support services is an entirely separate matter. Since all support services revenues go directly to the REA, one might view budgetary problems related to support services as simply an REA concern. However, because LEAs are the recipients of support services, it is their problem too. Support services revenues are generated on the basis of the total LEA weighted enrollment for the entire REA catchment area. Because the REAs have generally shown support services budget surpluses in the last couple years, the DPI has shown increased interest in recouping what appear to it to be excess funds. Since the DPI can't legally ask an REA to return money, it has proposed to reduced the allowable growth factor, which would allow recovery over time. However, for rural REAs like the Midland agency, surplus support dollars have resulted from an inability to fill all positions and not from exorbitant support service allocations. Most persons knowledgeable about rural deployment problems contend that tying support services revenues to enrollment (as has been done of late) is a mistake. Further, tying support service allocations to the state allowable growth factor has caused problems over the last few years because the legislature has had to reduce the state allowable growth rate. Now, a further reduction in the growth rate for support services budgets will most likely cause more serious problems, particularly for rural REAs who have had surpluses, for the most part, because of recruitment problems.

Finally, reductions in support service revenues will affect rural areas most negatively. We have discussed the issue of basing support dollars on enrollment and how it alone negatively affects services due to sparcity factors. We also know that the Midland REA serves one of the state's sparcest regions. The reductions discussed above, when considered in conjunction with the sparcity issue, represent a situation of most serious concern to the Midland agency.

Equity of Instructional and Support Services

The preceding sections have attempted to address issues related to the education of handicapped students in a linear fashion. That is, we started with issues and problems that are most likely to affect different contexts in about the same ways. As we worked down the list, we began to see that some problems apply more particularly to Midland's rural status. In presenting the issues we also attempted to address them singularly as much as possible, although the interaction among factors was most often too apparent to conceal. In this final section, however, we would like to consider the issues together and to assess the impact of Midland's rural status on the education of handicapped students there.

Instructional programs, of course, must be considered in terms of whether we are concerned with mildly or more severely handicapped students. Programs for mildly handicappped students are affected by three primary factors in the Midland area: the unavailability of all program types in each district, the greater expense involved in educating the student in another district, and parental preference for educating the student in the home district.

Once we accept the fact that fewer numbers of students in any given district preclude providing all program types, we must look then to its impact. When the appropriate program is not locally available, so that the student must be sent to another district, costs become a factor. There is a disincentive in the funding arrangement that influences program placement. The issue of whether a particular program type is the most appropriate placement notwithstanding, some mildly handicapped students are placed in programs other than those called for on their IEPs. Even if costs were not a factor, however, parents prefer placements in the home LEA. This preference is based not on travel per se, but on keeping the child with his or her friends, as well as in a socio-culturally familiar setting, particularly when parents perceive the distant setting as holding values different from the home community (e.g., different ethnic make-up, reports of alleged marijuana use). The irony, of course, is that the least restrictive placement provision of P.L. 94-142 is based on keeping the child in the most normative setting. In this sense, some rural parents are forced to choose between most appropriate and least restrictive.

Parents of moderately and severely handicapped children have even fewer options. Unless they live in or near Lincoln Center or one of the host LEAs, their children will undoubtedly have to travel to a program. When traveling is the only choice, further decisions must be made because the time lost in transit may not be worth the effort when a less appropriate program is closer to home.

Some state officials believe that there is greater equity when one considers support services in the REAs. Their position is that these services are "equally available." And whereas nearly everyone would agree that P.L. 94-142 and the REAs have moved us as close as one can realistically come to equity in support services availability, there is no doubt that rural REAs and the children they serve remain at a disadvantage. Sparcity factors increase the costs of support services because of the travel involved in delivering them. Because support services cost more in sparce areas, potentially fewer of them are available. But support services cost the student more in terms of direct service time simply because support staff spend more time in transit. An additional factor in rural areas is that salary differentials often are required to attract qualified staff. With a budget cap on support services revenues, this, too, eats away at the support services budget and further reduces direct service time because fewer staff can be hired for the same amount of money.

Are special education instructional and support services equitable in rural areas? Not by any means; it depends on where one lives. Low incidence and sparcity will always affect equity as long as enrollment is used as the basis for distributing resources. This is true when rural and urban contexts are compared, but it is also true within the Midland catchment area.

Transportation to Programs

Even though the Midland area fares better than most rural areas in terms of most "rural special education" problems, it is not immune to distance problems. In this, one of the sparcest regions in the state, some moderately and severely handicapped students must travel up to 55 miles one way to their programs. Mildly handicapped students, too, have not escaped the problems associated with sparcity. Although they are less often transported to their programs, we have seen how travel costs influence the types of programs they receive.

The REA's primary strategy for reducing travel requirements is, of course, its special education satellite offices. Through them, the REA has been able to decentralize support service staff which cuts windshield time and thus increases direct service time. The satellites have worked well in this regard, but even the satellite centers have not eliminated all problems. We have seen that some support staff still put in considerable time behind the wheel. Social workers, OTs, and PTs, for example, spend 25 percent of their time in transit and nurses drive 1,000 miles per month. Itinerant teachers may log 1500 miles in a month's time.

Travel demands caused by distance and sparcity, of course, are more than merely a nuisance. They directly affect the appropriateness of students' education programs in several ways. Mildly handicapped students are placed in programs occasionally that are other than those recommended by the staffing committee. Of course, there are other factors to consider in these circumstances as we have discussed, but the fact remains that deciding on an appropriate placement is often influenced by travel constraints. Not only do travel costs influence where a student is placed, but time in transit must also be considered in any placement decision. On occasion, decisions are made to place a student in a program closer to home because the instructional time lost in traveling to the most appropriate program renders that program less appropriate than a closer program. In an attempt to reduce student travel time, the REA proposed a series of central pick-up/drop-off points, but the plan did not work out because LEAs maintain different daily and yearly schedules.

Students from small, isolated LEAs suffer the most. Mildly handicapped students are more likely to be educated in the home district because travel to the closest appropriate program is more likely to be prohibitive. Moderately and severely handicapped students in these districts undoubtedly will have to travel further to the REA programs located in the larger LEAs. Here, total program costs are increased because of greater distances traveled and, to make matters worse, the student's instructional day is shortened because of the increased time in transit. Thus, small districts pay more for these programs and their students receive less.

WHAT CAN BE LEARNED FROM THE CASE?

In the preceding pages we have attempted to give the reader a "feel" for what it is like to live in the Midland REA, to provide a vicarious experience as seen through the eyes of the local participants. If we have been successful in providing such a "thick description," the reader by now will feel quite familiar with the REA, its circumstances, and its problems.

It is time to ask the question, "So what?" What can one make of all this? Is there anything to be learned? There are of course many lessons--although the reader should be careful not to assume that these lessons are generalizable to other regional service agencies indiscriminately. Indeed, a further reason for providing a thick description is to make it possible to reach a judgment about the degree of similarity between the Midland REA and any other site to which a reader might wish to transfer the findings. If there is a high degree of similarity, transfer might be appropriate--but even then caution will be the best weapon of the prudent.

Early in the narrative we highlighted the significant events that occurred in this state and the Midland area that fostered the development of special education programs. It was apparent from that history that local development depended on several factors. We saw that the first special education services became available when county superintendents' discretionary time increased because their workload was substantially reduced. As more time became available to them, those who were motivated to address special education services began to provide them. As parents learned of the availability of services in some areas, they began to request, and in some cases demand, equivalent services for their children. Where there were superintendents who were motivated, either by their own interest and awareness or by the pressure brought to bear by parents and/or advocacy groups, more and more services were offered.

Some districts and groups of districts over time became special education centers. This increased the demands for more services to the point where equity became a central issue in the state. Thus we see that services begat services, and the credit for their development has to be given to individuals who, through personal initiative, were committed enough to get involved. And so we learn

LESSON 1: THE DEVELOPMENT OF EXEMPLARY PROGRAMS FOR SOME FOSTERS THE DEVELOPMENT OF EXEMPLARY PROGRAMS FOR MANY. WE CAN NOT TURN BACK.

Even in the earliest days of development, districts which were compelled to provide special services had to join forces with other districts to be able to provide them. We know also that consolidation was resisted by local districts, but because local constituents were hungry for services of all types, including special education, they were willing to join forces under permissive legislation to improve their offerings. As the time when the federal mandate for special education was sure to come drew near, the plan for the REA network, which had lain dormant for some 10 years, became more palatable.

Although local districts were skeptical of the plan because they feared it would surely lead to more consolidation, once they were satisfied that local autonomy would be preserved, they went along with the proposed arrangement. After all, it had been altered to save local schools and, moreover, the REA was a way to provide services that parents wanted, while at the same time maintaining the local schools.

What is perhaps most interesting in this story is the way the REA concept developed incrementally. There is little doubt that the state's goal was a tighter education system. It had been attempted in stages for more than 20 years. But it wasn't until a system could be devised that spared the local districts from consolidation that it was finally acceptable. Even so, it took the eminence of P.L. 94-142, as well as the funding mechanism necessary to carry out the special education mandate, before the LEAs would budge.

Since the initiation of the REA system, the locals have come to see it as a way to avoid consolidation rather than a threat to local autonomy. And so we learn

> LESSON 2: REGIONALIZED SERVICES WILL BE ACCEPTED BY LOCAL DISTRICTS AND VIEWED AS AN ASSET IF THE DESIGN OF THE SYSTEM CONFORMS TO THEIR DESIRE FOR LOCAL AUTONOMY. REGIONALIZED SERVICE AGENCIES CAN MAKE IT POSSIBLE FOR LOCAL DISTRICTS TO KEEP THEIR SCHOOLS AND HAVE THE SERVICES THEY COULD NEVER HAVE PROVIDED ON THEIR OWN.

With the REA came Chapter 300 and, shortly thereafter, P.L. 94-142. And with these mandates, naturally, came regulations. Although very few people would argue with the intent of the statutes, some believe that P.L. 94-142 is overregulated. The state level view is that Chapter 300 provides essentially the same guarantees as P.L. 94-142 but that the federal statute, because it was designed for general implementation, can cause undue hardship on smaller, rural districts.

More importantly, many observers believe that making certain to meet the specifications of P.L. 94-142 detracts from the real business at hand--educating handicapped students most appropriately. The reader should have realized by now, however, that Chapter 300 is not without its share of paperwork. The time necessary to certify weighted student counts occupies the time of many people that could be more productively occupied in the education of handicapped students. And so we learn

> LESSON 3: THE VEHICLES FOR MAKING CERTAIN THAT HANDICAPPED STUDENTS RECEIVE AN APPROPRIATE EDUCATION CAN BECOME THE VERY THINGS THAT DETRACT FROM ONE'S ABILITY TO MAKE CERTAIN THAT HANDICAPPED STUDENTS RECEIVE AN APPROPRIATE EDUCATION.

There is more to seeing that compliance is maintained than passing down a set of regulations to those who are to follow them. Someone has to be in charge. Under the REA arrangement, that person is the director of special education. The director becomes the coordinator of all programs in an area and is the person responsible to the state for compliance. The powers given to the Midland director place him in the position of authority over all Midland programs. But along with that authority comes responsibility. Through the consolidated application procedure, he is as much under scrutiny when the state monitors an LEA as the LEA is itself. To make certain the LEAs are in compliance takes a combination of technical assistance and finesse. The director places a special education consultant in the position of administrative consultant to help LEAs stay in compliance and he deals with questionable calls as they arise. In many ways, the regulations are one thing and actual compliance is another. The Midland director understands that the regulations will never fit all situations and that a certain amount of flexibility combined with a fair amount of finesse is necessary to make certain that all interests are accounted for. Fortunately, Chapter 300 contains enough flexibility, complemented by the director's finesse, to work out virtually all situations to the mutual satisfaction of everyone. From this we learn

LESSON 4: RULES NEED TO BE WRITTEN FOR ALL AND BENT FOR THE FEW. TO EXPECT ANY SET OF RULES TO FIT ALL SITUATIONS, PARTICULARLY WHEN THE POTENTIAL SITUATIONS ARE LIMITLESS, IS FOOLHARDY.

Naturally, some districts have a much easier time living up to the rules than others. Those in the Midland area which have had a history of special education involvement are in a much better position to comply. Their administrators understand the goals of special education and have more experience supervising local programs, and their teachers have had more time to adjust to the demands of their roles in the education of handicapped students.

The Midland districts which have had the most experience with special education are of course the ones that were involved in the Tri-County Special Education Cooperative or the Richland arrangement. These districts have been providing programs of one type or another for more than 14 years. It is also significant that the current Midland director of special education was the director of the Tri-County arrangement and his assistant director was director in Richland County (Wonder Bay). Thus we see that history is more than the passage of time. It involves personalities, friendships, knowing one another's style. All this facilitates the operation. In effect, both the Midland director and assistant director of special education have been coordinating the Midland special education program since it began. And so we learn

LESSON 5: EXPERIENCE IS THE BEST TEACHER. EXPERIENCE WITH PROCEDURES, PROGRAMS, AND PEOPLE FACILITATES THE OPERATION.

The two Midland LEAs with the most experience in providing special education programs are Lincoln Center and Wonder Bay. They are the largest cities in the area and, in conjunction with the REA, offer the most programs. Lincoln Center is the larger operation of the two as we know. However, before the REA, Wonder Bay served as the host district for the Richland County special education program, which provided special classes for all of the LEAs in the county and provided speech and psychological services for three additional counties. Lincolnc Center, of course, was the home of the old Tri-County arrangment.

Of all the LEAs, Lincoln Center serves the most students and offers the greatest variety of programs. Its program are also unique. The experimental program for high-functioning TMH students and low-functioning EMH students is perhaps the best example; it creates another placement option within the continuum of options available in the Midland area. It is not surprising that an experimental program should start in Lincoln Center. Its history combined with its size make it a natural environment for change. Its size, experience, and resources, along with the ability to attract and select the best personnel, create the discretionary time (and resources) to make such advances possible. While most of the other Midland LEAs are working toward establishing their programs, Lincoln Center is able to make refinements because its programs are established. From this we learn

LESSON 6: THE COMBINATION OF EXPERIENCE AND SIZE ACT TO FACILITATE THE ESTABLISHMENT OF PROGRAMS AND ALLOW FOR THE DISCRETIONARY TIME AND RESOURCES TO REFINE AND EXPAND OTHERS.

Another ingredient in providing special education services is, of course, the necessary fiscal resources to maintain them. As we have seen, the REA is better endowed than most agencies. The state funding system has provided the resources for it to establish an impressive array of programs and services over the years. However, a number of political and economic conditions have caused the state to fine-tune the system over the past few years. We have seen that this "doctoring up" has introduced a new set of problems for the REA. Once assured of an expandable support services budget, the REA can no longer count on those dollars to expand as needs do. And while growth is still possible, it is not enough to keep up with demand.

Although some fine-tuning is to be expected in economic conditions such as these, adjustments to solve immediate problems often cause others. Moreover, the impact is often felt more severely by some than by others. The Midland REA is in a particularly vulnerable position since the system for generating support service revenues, even when it was not based on enrollment, was unfair to sparcely populated areas. Now that reimbursements are based on enrollment, the Midland agency is placed in an even tighter bind because the Midland area has the fastest declining enrollment in the state.

Instructional dollars, too, are in short supply. Reductions in the allowable growth factor hurt the REA in terms of both instructional and support dollars. But perhaps the most ironic thing about the funding system is that instructional dollars are available statewide. The problem is that because of variable needs each year in the LEAs, the dollars are not always where they should be. The state is working on the problem, as we have noted. But until the situation is remedied, the Midland LEAs will have to continue to be conservative with their special education dollars.

And so we learn

LESSON 7: SPECIAL EDUCATION FUNDING FORMULAS COME IN ALL SHAPES AND SIZES, AND HOW THEY WORK INITIALLY AND AFTER THEY ARE FINE-TUNED TENDS TO AFFECT DISTRICTS AND CHILDREN OF ALL SHAPES AND SIZES DIFFERENTIALLY.

Because the funding formula contains an incentive to serve students in the home district, some students are not placed in the programs recommended by the staffing committees. Locally available programs are modified (made into a multi-categorical room) or, in fewer cases, a student is placed in a program designed for students with handicaps other than his own so that the LEA can place the student in one of its own programs.

We have also noted that in nearly all cases, parents prefer the home LEA placement over one in another district. In some cases, the district and the director of special education agree that the student should be placed in a program in another LEA, and the parents will ask for a change so that the child can stay in a "less than appropriate" program in the home LEA. Here, the resource program is used as a "net." The child is placed in the program and, if things work out, fine. If not, parents can usually be convinced that the inter-LEA placement initially recommended is necessary. As we have pointed out, however, one should not assume the initial recommended placement is always the most appropriate placement.

The result has been, of course, an increase in the number of multicategorical resource rooms, particularly in the smaller LEAs. For students labeled as EMH, these placements have amounted to less restrictive placements than would ordinarily be the case. The issue involved, however, centers on whether these placements are most appropriate for EMH students. For students labeled ED, who appear in much fewer numbers, the options other than the multicategorical rooms are more limited if he or she doesn't live near Lincoln Center or Wonder Bay. Students who are labeled LD traditionally have been served in categorical resource rooms. Whether multicategorical rooms are appropriate for any student depends on one's philosophy, and the national trends point toward a dramatic increase in the use of such programs. And, one can certainly understand the parents' position. Moreover, who is to say what "appropriate" is for any given situation? Appropriateness is situational. And so we learn

LESSON 8: PLACEMENT DECISIONS FOR SOME MILDLY HANDICAPPED STUDENTS ARE MADE FOR REASONS OTHER THAN "APPROPRIATENESS."

In the Midland LEAs, as in most LEAs, an appropriate placement is determined by many factors. The program deemed appropriate by the staffing committee most likely is determined on the basis of a rational decision based on the evaluation evidence. That would be fine if this were solely a rational world. The problem with rational decisions, of course, is that they cannot consider all the influences that might render them inappropriate. Not only might two separate staffing committees come to different conclusions about the same child, but what one committee might decide today might be inappropriate tomorrow because the child has changed. Trial placements, rule exceptions, using the resource room as a net--all of these may be more appropriate decisions than a rational one based on what all must be based on--incomplete information.

Moreover, in terms of what we have learned about the differences among Midland schools, the most appropriate placement choice for a mildly handicapped student most likely will be the building with the best "climate," wherever it may be and whatever the program may be called.

And so we learn,

LESSON 9: THE MOST APPROPRIATE PLACEMENT FOR A MILDLY HANDICAPPED STUDENT WHO WILL SPEND PART OF HIS OR HER SCHOOL DAY IN THE REGULAR CLASSROOM WILL BE THAT PROGRAM IN THAT SCHOOL BUILDING IN WHICH: (1) THE ADMINISTRATOR IS SUPPORTIVE OF SPECIAL EDUCATION AND OF THE SPECIAL TEACHER, AND (2) IN WHICH THE REGULAR TEACHERS AND THE SPECIAL TEACHER ARE AWARE OF THEIR ROLES AND ARE CAPABLE OF CARRYING OUT A COORDINATED PROGRAM.

Finding a building with the right climate is, of course, the hard part.

Like it or not, education has changed. This is true particularly when one considers how mildly handicapped children are mandated to be educated. Along with the change in the delivery of services have come new roles for everyone who works in schools. Regular teachers now are expected to modify their classroom procedures to accommodate handicapped students. Special teachers are expected to come out of their classrooms and work with regular teachers to facilitate the integration of handicapped students into the regular program. Administrators, particularly building principals, are expected to provide support to all teachers and, in general, to provide leadership as teachers adjust to their new roles.

The problem is that while teachers and principals are expected to carry out their new roles, they also are expected to carry out their former roles. Expectations have been added; none have been taken away. So, while the regular teacher must accommodate the handicapped learner by making curricular and instructional adjustments, he or she is expected to carry out the ordinary duties of the classroom teacher. Special teachers, on the other hand, are expected to coordinate with the regular teacher and to act as change agents. Meanwhile, he or she continues to see the same number of students as before, perhaps even more. The principal not only has the duties which have made him or her less of a leader and more of a manager over the years, but now has the added administrative duties associated with supervising a special education program, which includes settling disputes among regular and special teachers, if those teachers even talk to one another.

The one added element in the Midland LEAs is the special education consultant, but we have seen that he or she, like the others, has been rendered less effective because of role displacement. Most of his or her work time is devoted not to facilitating programs but compliance paperwork. Moreover, teachers have always been loosely connected to one another. For the most part, they have only worked in buildings together; they have never really worked together; they have never learned the rules of cooperative teaching. The problem is just more obvious now because this is what is currently expected of them.

And so we learn

LESSON 10: FOR MILDLY HANDICAPPED STUDENTS, P.L. 94-142 REPRESENTS A STATE OF THE ART MODEL OF SERVICE DELIVERY LAID ON TOP OF A SYSTEM THAT IS NOT TOTALLY READY FOR IT. THE MODEL REQUIRES AN INTERDISCIPLINARY TEAM APPROACH AND EXTENSIVE COMMUNICATION AMONG REGULAR AND SPECIAL TEACHERS AND ADMINISTRATORS. IN MANY CASES THE CURRENT SYSTEM CAN'T BEAR THE WEIGHT.

Although the impact of the Midland REA special education program on low-incidence populations has been very impressive, its impact on the education of mildly handicapped students has suffered from many of the same problems that are evident at the national level. Special education has not been able for the most part to make the alliances it needs to make with regular education to affect the changes necessary to provide appropriate programs for mildly handicapped students under the least restrictive principle.

Moreover, the attention and fiscal support special education has received since the mid-1970s have made matters worse. These factors in combination with the mandate itself have caused resentment toward special education to swell. In many respects, this resentment stands in the way of progress for the mildly handicapped student. And while some have managed to overcome or work around or in spite of the pressure that has built up over the years, many have not.

And so we learn

LESSON 11: RESENTMENT TOWARD SPECIAL EDUCATION AMONG REGULAR EDUCATORS IS VERY APPARENT IN SOME SCHOOLS AND ACTS AS A SIGNIFICANT BARRIER TO THE APPROPRIATE EDUCATION OF MILDLY HANDICAPPED STUDENTS IN THE LEAST RESTRICTIVE SETTING.

Despite these problems, the Midland REA is truly an impressive agency; it would be so even if it were located in Chicago. It demonstrates that a cooperative agency can make great gains with the appropriate resources, great gains on behalf of handicapped children. But by resources we mean more than money. Of course, money is necessary, but human resources are the real assets in the type of work the REA does. And, as we have noted, it is not surprising that the REA's instructional and support services are of such high quality. The staff know what they are doing; they are confident professionals doing the jobs they were trained to do.

And so we are happy to learn

LESSON 12: IT CAN BE DONE. QUALITY SUPPORT SERVICES AND INSTRUCTIONAL PROGRAMS FOR LOW-INCIDENCE POPULATIONS CAN BE DELIVERED IN SPARCELY POPULATED RURAL AREAS IN A RELATIVELY EQUITABLE MANNER IF THE APPROPRIATE HUMAN AND FISCAL RESOURCES ARE IN PLACE.

And we can't forget the babies! Nor will we forget the gratitude expressed by their parents. There is very little more we can add to what we have already said about the preschool program. Again, the staff is exceptional. The impact of the program is immediately apparent and promises to multiply again and again as the children continue to grow and develop.

And we are very happy to learn

LESSON 13: EFFECTIVE HOME AND CENTER-BASED PRESCHOOL PROGRAMS CAN BE DELIVERED IN SPARCELY POPULATED RURAL AREAS IF THE APPROPRIATE HUMAN AND FISCAL RESOURCES ARE IN PLACE. THESE PROGRAMS CAN HAVE A SIGNIFICANT IMPACT ON THE LIVES OF YOUNG HANDICAPPED CHILDREN AND THEIR FAMILIES AS WELL AS ON THE ATTITUDES OF THE COMMUNITY TOWARD PEOPLE WITH DISABILITIES. MOREOVER, THESE PROGRAMS CAN VIRTUALLY PAY FOR THEMSELVES OVER THE LONG TERM.

INTERORGANIZATIONAL SPECIAL EDUCATION PROGRAMMING IN RURAL AREAS: TECHNICAL REPORT ON THE MULTISITE NATURALISTIC FIELD STUDY

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

VOLUME III

Research Contract No. 400-81-0017 from
the National Institute of Education to the
Department of Special Education
University of Kansas, Lawrence, Kansas 66045

© 1985

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

This report is made pursuant to Contract 400-81-0017. The amount charged to the Department of Education for the work resulting in this report (inclusive of the amount so charged for any prior reports submitted under this contract) is $194,922.77. The names of the person, employed or retained by the Contractor, with managerial or professional responsibilities for such work, or for the content of the report, are as follows: Thomas Skrtic, Earle Knowlton, Egon Guba, Neil Salkind, Edward Meyen, Kathleen Bolland, Stephen Foster, Lynda Schoonmaker.

The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that agency.

TABLE OF CONTENTS

VOLUME I

PART Page

I Introduction 1
    The Problem 1
    The Field Study Research Questions 2
    Overview 4

II Methods 6
    The Emergent Paradigm of Thought and Belief 6
    The Paradigm of Naturalistic Inquiry 10
    Implications for the Doing of Inquiry 14

III Procedures 20
    The Design Update 20
    Site Selection 21
    Procedures for First Visit to Each Site 24
        Initiating Contact and Gaining Entre 24
        Sampling Respondents 25
        Consent Forms 25
        Logistics 26
        Interviewing 27
        Document Collection 30
        Journal Entries 30
        Other Activities 31
        On-Site Team Interactions 32
        Debriefing 33
    Analyzing Site Visit 1 Data 34
        Unitizing 34
        Individual Categorizing 35
        Team Categorizing 37
    Procedures for Second Visit to Each Site 38
    Analyzing Site Visit 2 Data 40
    Drafting the Case Study 40
        Indexing the Materials 40
        Generating an Overall Outline 41
        Cross-Referencing Materials to the Outline 43
        Conventions Governing the Writing 44
        Integrating Themes Drawn from the Research Synthesis 46
        Developing Questions for Site Visit 3 48
        Abstracting Problems/Issues and Generating Lessons to be Learned 48
    Internal Review and Revision of the Case Study 49
    Procedures for Third Visit to Each Site 50
        Selecting the Review Committee 50
        Delivery of Pre-Visit Packet 51
        The All-Day Review Meeting 52
        Interviews with Special Respondents 53
        Debriefing 54

- Final Revision of the Case Study 54
- Trustworthiness 55
  - Counterpart Criteria 55
  - Operational Techniques for Meeting the Trustworthiness Criteria 57
  - The Present Study and Trustworthiness 59
- Notes on Methodological Issues 62
  - Some Practical Issues 62
    - Contract/Paradigm Disjunctions 62
    - Design Problems 64
    - Problems in the Field 67
    - Problems in Writing the Case Study 69
    - Problems with the Member-Check (Review Committee) Process 73
  - Some Theoretical Issues 75
    - The Feasibility and Utility of Trustworthiness Measures 75
    - Fitting the Naturalistic Paradigm: Was the Right Model Selected to Guide the Inquiry? 78

IV Results 81
- Introduction 81
- Organizational/Governance Issues 81
- Service and Delivery Mechanism Issues 94
  - Instructional Programs 94
  - Non-Instructional Services 95
  - Some Observations 96
  - Child Find 97
  - The Staffing (IEP) Process 98
  - Facilities 102
  - Private and Parochial Schools 104
  - Recruitment and Retention 106
  - Organizing for Service Provision 107
  - Training 110
  - Administrative Relationships 112
  - Parental Involvement 113
  - Involvement in the IEP/Staffing Process 114
  - Due Process 115
- Effectiveness and Impact Issues 117

V Generality of Findings 134

VI Conclusions and Policy Recommendations 136
- Caveats 136
- Needs 139
- Trade-Offs 141

References 147
Appendix A: Auditor's Report 149
Appendix B: Tables of Interviewees 164

VOLUME II
APPENDIX

C Site #1 Case Study 1-88

D Site #2 Case Study 1-124

VOLUME III
APPENDIX

E Site #3 Case Study 1-66

F Site #4 Case Study 1-134

G Site #5 Case Study 1-43

VOLUME IV
APPENDIX

H Commissioned Papers . . . .

- Special Education in Rural America, Paul A. Worth 1-53
- Dean's Grants Projects and Rural Education, Maynard C. Reynolds 1-50
- Local Implementation of P.L. 94-142: Similarities and Differences Between Rural and Nonrural Local Education Agencies (LEAs), Anne R. Wright 1-19
- Problems and Strategies Regarding Regionalizing Service Delivery: Educational Collaboratives in Rural America, Doris Helge 1-47

Appendix E

Site #3 Case Study

The Foothills Area Service Agency

THE FOOTHILLS AREA SERVICE AGENCY:

A CASE STUDY

The third of five case studies appended to
Interorganizational Special Education Programming in Rural Areas:
Technical Report on the Multisite Naturalistic Field Study

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

January 12, 1983

© 1983

Department of Special Education
School of Education
University of Kansas
Lawrence, Kansas 66045

"The work upon which this publication is
based was performed pursuant to Contract No.
400-81-0017 of the National Institute of
Education. It does not, however, necessarily
reflect the views of that Agency."

TABLE OF CONTENTS

Page

LIST OF TABLES iii

LIST OF FIGURES iv

SECTION

1 The Area: Demographics and Descriptors 1
  Characteristics of the Area 1
    The People, The Politics 2
  An Introduction to the Foothills ASA 2
  An Introduction to the Local Education Agencies . . . 3

2 Governance of the Foothills ASA 6
  The State and Its Department of Education 6
    Special Education Monitoring 6
  Characteristics and Functions of the ASA 8
    Organization and Administration 8
      The ASA Director/District Superintendent . 11
      The Director of Special Education 11
      The Director of Occupational Education . . 12
      The Director of the Center for Rural Supplementary Education 13
  Funding Policies 13
    Regulation 77: Evolution, Features, Monitoring 14
    SEA Reimbursement for Special Education Costs . 16
    Sources of ASA Funds for Special Education . . . 18
    Timeline for Service Agreements 19

3 Service Delivery 22
  The Evolution of and Rationale for the ASA 22
  Special Education: Programs and Personnel 23
    Instructional Programs for Handicapped Students 27
      Learning Strategies Resource Rooms 27
      Individually Paced Basic Academic Programs 30
    Individual Academic Programs Emphasizing Behavioral Adjustment 31
      Basic Life Skills and Functional Life Skills 31
    Support Services for Handicapped Students . . . 32
      School Psychological Services 32
      Itinerant Teacher of the Visually Impaired 32
    Special Education Training and Resource Center . 33
    Personnel Configuration 35
    Master Teacher 35

Other ASA Services 36
Occupational Education 36
Rural Supplementary Education 37
Educational Films/Film Services 37
Educational Communications 37
Microcomputer Applications 38
Identification and Processing of Handicapped Students 38
Referral and Admission of Pupils into Special Education Programs 39
Pre-placement Evaluation 39
Evaluation and Placement 39
Development of the Individualized Education Program 40
Review 42
Parent Participation and Procedures Ensuring Their Right to Due Process 42
Staffing of Handicapped Students in the Occupational Education Program 44
The Context of Collaborative Relationships . . . 44
LEA/ASA Relationships 46
Occupational Education 46
CRSE 46
Special Education 46
SETRC 47

4 Some Issues of Particular Concern to the ASA 48
Stigma 48
Interpersonal Qualities of the Special Education Teacher 49
Attitudes Toward Special Education and Handicapped Students 51
The Community 51
Regular Classroom Teachers 51
Nonhandicapped Students 52
Parental Participation 53
Changes in State Programmatic and Fiscal Policies: A Search for Balance and Equity 54
Service Delivery 55
Children Needing Related Services 55
Children Under Five 56
High Risk and Unserved Children 56
Gifted Students 57
Children Who Fell Between the Cracks 57
Handicapped Children Transported to Other LEAs . 57
Staff Retention 58
Local Autonomy 58
The Big Four: Interactions of Oft-Cited Barriers to Quality Services in Rural Areas 59
Sparsity 60
Terrain and Climate 60
Distance 60
Interactions of the Big Four 61

5 What Can Be Learned from the Foothills Case 62

LIST OF TABLES

Table Page

1 Demographic Data for Foothills Area LEAs (October 1981) 4

2 Excess Cost Increments Used to Compute an LEA's Resident Weighted Average Daily Attendance 17

3 Timeline for Service Agreements 20

4 Changes in Numbers of Supervisory Districts/ASAs: 1933-1982 23

5 Distribution of ASA and LEA Special Education Personnel across Component LEAs 26

6 Basic Data about ASA Special Education Programs 28

LIST OF FIGURES

Figure		Page
1	SEA Organization	7
2	ASA Organization	9
3	Map of Foothills Supervisory District/ASA Region . .	24

THE AREA: DEMOGRAPHICS, DESCRIPTORS, HISTORY

Characteristics of the Area

The focus of our story is a six-county area dressed in rich, wooded landscape peppered across mountainous terrain. Perhaps we never saw its true beauty since each of our visits was accompanied by 18 to 20 inches of fierce snow. Our first impression about the character of those who run the schools was their polite, yet ho-hum reaction to our lamenting small talk about that wretched weather!

From our point of view, not only the schools but everything else should have shut down; to them it was business as usual. Business as usual includes the delivery of special education, occupational education, and educational communication services to 21 local school districts through the Foothills Area Service Agency (ASA) located in Brownsville, a town of 12,000 people.

The place is unique: unique in its people, its towns, its awareness. As we talk about the ASA, what they do, how they do it, and how they pay for it; we hope to explain this uniqueness. But first, we should set the stage: the terrain, the climate, and the communities.

Land rich and dollar poor describes the area about as succinctly as a descriptor can. The 2050 square mile ASA catchment area comprises parts of six counties. The countryside is mountainous, separating the towns by eight to twelve mile stretches. These stretches seem much longer, however, because one tends not to drive level and straight, but rather up, down, and around.

All of the towns claim "agribusiness" as their industry. Tourism ranks second, although 50 years ago, the area was a hot-spot for tourism. As society became more mobile, wealthy tourists traded the summer automobile drive to the mountains in favor of a DC-10 trek to the sands of Palm Beach or even the Mediterranean. Consequently, dairy cattle became more revered than swim suits.

This 20-year transition coupled with a sick national economy make "real" dollars hard to find. One ASA board member told us that although the population is relatively stable[1], it is aging, with more and more people retiring. School populations are declining while property values and taxes are increasing. Some believe that wealthy "down-staters" who have purchased area property for summer homes overestimate the local value of property and pay much more for it, inflating property valuation. Although the dairy industry currently accounts for incoming dollars, many of those interviewed are counting on the newly developing winter sports industry to provide the local economy the shot in the arm it needs.

---

[1] There was some disagreement among those interviewed concerning population stability. Although the population is generally aging, declines in terms of real numbers tend to be offset by newcomers from the cities.

The People, The Politics

Besides agribusiness, the schools, colleges, and hospitals are the area's largest employers. Agricultural support industries such as railroads, trucking, and some manufacturing, combined with educational-, and health-related jobs, provide employment for most area non-farm residents.

Those residents are an interesting sort. Close enough to a major metropolis, they shun that fast-paced cosmopolitan atmosphere in favor of a quiet, pastoral existence. Afternoon radio talk shows out of Tekawitha, a town about 40 miles north of Brownsville, discuss the merits of steel- vs. iron-reinforced wood stoves. The people are rural but not unsophisticated. They're sharp enough to avoid city life in the '80s and smart enough to bring sensibility to life in 18 inches of snow. Most seem to forego the trendy equipment common to some of today's rural areas. A sedate Ford with good snow tires does just as well as a $10,000 four-wheel drive pick-up truck.

Perhaps the following anecdote best sums up our portait of this community. Not known for his preparedness, one of our site visit team members parked his vehicle in a Brownsville service station lot as close as possible to the local diner to avoid slipping on the ice with his flat-soled loafers. Unfortunately the vehicle was blocking a newly repaired car awaiting its owner. Upon returning, the driver found a note on the windshield:

> We welcome visitors to our community. But, it would have been nice if you had asked to park here. We had a lot of trouble getting Jack's car out since yours was blocking it.

No air let out of the tires, no smashed windshield, no macho reprimand; only a friendly admonition.

Politically, the people are neither naive nor apathetic. Local residents appear harassed by the pressures of school consolidation, state policies that appear to favor urban citizens, a seemingly dwindling autonomy at the local level, and apparent inequities. Half seriously, one ASA official told us that all citizens of the state pay for transportation: turnpikes, roads, subways, etc. Yet, "we don't ride subways, but they use the interstates."

The major point we'd like to emphasize about the area is simple. These are sophisticated, self-assured people living a life of choice. Equity is the major political issue here: urban/rural, large/small, have/have-not. And for the schools, the issue is extended: non-handicapped/handicapped.

An Introduction to the Foothills ASA

The primary mission of this and each of the state's over 40 ASAs is to provide educational services that a single local school district could not provide itself. In general, ASAs provide a mechanism by which two or more local districts can share educational services. The Foothills

ASA provides services in general education (guidance, French, art, music, home economics, industrial arts, and physical education), as well as an array of specialized services classified organizationally into special education, occupational education, and educational communications.

Services of the first arm, special education, include resource and self-contained classes, and services of school psychology, and speech/language therapy. Currently, the ASA operates 38 special education classrooms in 27 locations both within local school districts and in two vocational education sites serving the catchment area. For moderately and severely handicapped students, the ASA either provides services directly or, in many cases, collaborates with other agencies to deliver the appropriate program services. The ASA also provides a total of seven school psychologists and 11 speech/language therapists whose services are shared by the local schools.

The second arm, occupational education, is viewed as the highest priority by local schools, despite the higher visibility of special education in the general public's eye. It would appear that vocational preparation has more direct impact on the communities or, as we shall see, a longer history. Just as with special education, occupational education is provided to students in the two occupational education centers through contracted services that will be described in detail in the next section.

The third arm of the ASA is responsible for educational communications. The Center for Rural Supplementary Education (CRSE) actually "umbrellas" educational communications (TV, films) and other services such as a media library and, of late, microcomputer applications.

The ASA Director and his staff deal with the schools through organizational activities that will be described in the next section. A major organizational linkage between the ASA and the schools is the nine-member ASA Board of Directors through which schools have input to decision making and ASA services. The Board meets monthly with a predominant focus on policy, budget- and curriculum-related matters. There is not necessarily a one-to-one correspondence between Board members and local districts; some Board members represent two or three of the smaller local education agencies.

An Introduction to the Local Education Agencies

Twenty-one local education agencies (LEAs) participate as component districts in the Foothills ASA's services. These LEAs are for the most part small; many of them house grades K-12 in one building. Administratively, each has a school board and a superintendent, who in many cases also serves as building principal. Assistant superintendents, when they exist, may also function as building principals. In three of the LEAs, there are student populations sufficiently large enough to warrant mutually exclusive superintendents and principals.

Table 1 displays school district child counts as of October, 1981. Over 12,000 students attend classes in the 27 school buildings of the

Table 1

Demographic Data for Foothills Area LEAs (October, 1981)

COMPONENT LEA	ORGANIZATION	ENROLLMENT				FACULTY	PUPIL/ TEACHER RATIO	NUMBER OF ADMINISTRATORS
		K-6	7-12	SPED[1]	TOTAL			
Garnet City	K-6-6	121	103	6	230	22	10.5	2
Georgetown	K-6-6	135	128	0	263	22	12.0	1
Halltown	K-6-6	153	123	6	282	18	15.7	2
Hendrixson	K-6-6	205	203	3	411	33	12.5	2
Tilbury	K-6-6	233	192	9	434	26	16.7	2
Gayner-Roseville	K-6-6	227	222	8	457	31	14.7	2
Frisch	K-6-3-3	236	214	8	458	29	15.8	2
Leisler	K-6-3-3	224	227	7	458	33	13.9	2
Apple Valley	K-6-6	253	213	4	470	30	15.7	2
Lafayette	K-6-6	258	217	5	480	33	14.5	1
North Snowcourt	K-6-3-3	246	241	6	493	34	14.5	2
Warren	K-6-6	246	246	6	498	35	14.2	2
Brice-Curtissville	K-6-3-3	249	251	6	506	38	13.3	3
Brownsville	K-6-6	271	247	6	524	35	15.0	2
Middleton	K-6-3-3	286	243	0	529	35	15.1	2
Cherry Hill	K-6-6	270	253	7	530	32	16.3	2
Laurel	K-6-6	260	279	9	548	34	16.1	2
Barston	K-6-3-3	264	272	19	555	33	16.8	2
Fredericksville	K-6-2-4	297	290	24	611	49	12.5	3
Carlton	K-6-6	539	618	16	1,173	75	15.6	4
Tekawitha[2]	K-6(4)-2-4	1,037	1,130	56	2,223	--	----	11
TOTALS		6,010	5,912	211	12,133	677	14.6	53

1. Handicapped students served by LEAs.
2. Faculty data not provided because of independent district status.

catchment area. Quite a range in size of LEAs is apparent, with the largest totalling over 2,300 students and the smallest under 300 students.

The three largest of the 21 LEAs operate at least one special education program for mildly handicapped students. Usually these have begun by contracting with the ASA for special education teachers to start a program, a resource room, for example. Then, as LEAs become familiar with state regulatory requirements, and are able to comply with them, they hire that teacher and take control of the program. Each of three small- to medium-sized LEAs has hired its own school psychologist, and one, its own speech/language therapist.

The section to follow will discuss in depth these and other factors that comprise the governance structure and functions of the Foothills ASA.

GOVERNANCE OF THE FOOTHILLS ASA

The State and Its Department of Education

In structure and function, the State Education Agency's (SEA) political system and accompanying bureaucracy are little different from those of many other states. But the legislature has historically shown a willingness to underwrite a strong state educational system, one that responds equitably to the needs of handicapped students. Nevertheless, a heavily bureaucatic educational structure emphasizing policy-making and policy-implementation that moves from the top to the bottom, that is, "top-down," characterizes the system.

The 15-member State Board of Regents is elected by the Governor to set and oversee policy for an educational system that includes primary to university levels. Four major units comprise the top-level components of the State Department of Education: Elementary, Secondary, and Continuing Education; Cultural Education; Vocational Rehabilitation; and Higher and Professional Education. There are no fewer than 15 offices and bureaus comprising even the smallest of these units: Vocational Rehabilitation. The largest, Elementary, Secondary, and Continuing Education, is divided into four offices that, in turn, subsume 67 bureaus and divisions.

A summary organizational chart is shown in Figure 1; however, such a chart is incapable of capturing the full complexity of the arrangements for at least two reasons. First, it does not represent adequately the actual powers afforded to the State Board of Regents and, through them, to the Commissioner and his officers. The State Board "governs" the state department, ". . . sets educational policy, and . . . makes rules which have the force and effect of law." In this sense the Board is equivalent to the legislature.

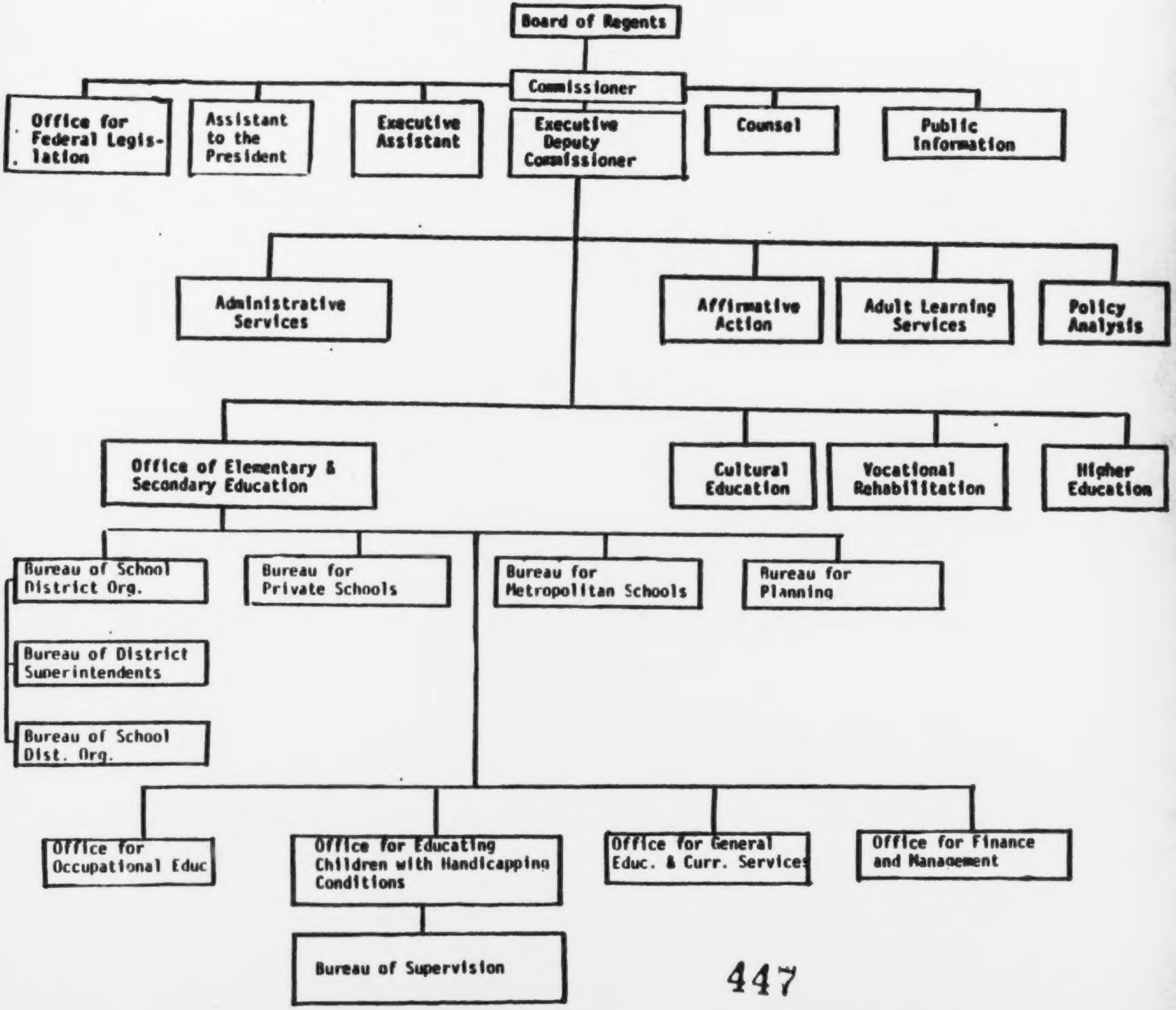
Nor does the chart well reflect the roles of the Bureau of School District Organization and the Bureau of District Superintendents. These two bureaus respectively supervise the functions of the ASA Directors and the District Superintendents. The ASA Director is responsible for all the services provided by the ASA; s/he is a service provider. The District Superintendent, however, supervises the operation of each of the LEAs that make up the catchment area of the ASA. In the Foothills catchment area, 20 of the 21 LEAs are "dependent districts." As such, they are too small to run independently of the supervision of a District Superintendent. In contrast, an "independent district" and its superintendent report directly to the SEA.

And here's the rub: the same person occupies both roles of ASA Director and District Superintendent. The Foothills ASA (answerable to the Bureau of School District Organization) and the Foothills Supervisory District (answerable to the Bureau of District Superintendents) are run by the same individual; thus we have here a classic example of the "two-hats, two-masters" conflict.

Special Education Monitoring

The state, as such, provides maximal supervision through the above two bureaus with respect to the ASA's educational services. However, it

Figure 1: SEA Organization


Board of Regents
Commissioner
Office for Federal Legislation
Assistant to the President
Executive Assistant
Executive Deputy Commissioner
Counsel
Public Information
Administrative Services
Affirmative Action
Adult Learning Services
Policy Analysis
Office of Elementary & Secondary Education
Cultural Education
Vocational Rehabilitation
Higher Education
Bureau of School District Org.
Bureau for Private Schools
Bureau for Metropolitan Schools
Bureau for Planning
Bureau of District Superintendents
Bureau of School Dist. Org.
Office for Occupational Educ
Office for Educating Children with Handicapping Conditions
Office for General Educ. & Curr. Services
Office for Finance and Management
Bureau of Supervision

BEST COPY AVAILABLE

also monitors special education separately through the Office of Education of Children with Handicapping Conditions and its monitoring branch, the Bureau of Supervision. Thus, two major activities are conducted with respect to special education compliance monitoring. First, the Bureau of School District Organization requires annual reports from ASAs concerning all of their operations including special education (students served, costs, and short- and long-term plans). Secondly, Bureau of Supervision staff visit ASAs at least once every three years for the purposes of on-site inspection of, and feedback to, ASAs regarding program quality in terms of their compliance with state and federal regulations for the education of handicapped students. The SEA's special education monitoring procedures are discussed in detail in a later section entitled "Regulation 77: Evolution, Features, Monitoring."

Characteristics and Functions of the ASA

Brownsville could well have been the model for the miniature buildings of the town around which Lionel's model trains chugged. That model village sets just the right tone for the location of the ASA, which occupies a building that must be seen to be believed. It's an old summer vacation hotel, the Calvin, renovated by the ASA with some federal assistance in the form of capital improvement funds and (separately) CETA labor. The closing of the hotel reflects the decline of tourism as the major area industry.[1] The Calvin is now called the John MacAdam Center (named after the inventor of pitched asphalt).

The center's facade conveys the benignly authoritative feeling of turn-of-the-century architecture; yet its setting--three acres of rolling grassland--downplays its square, six-story bulkiness. Once inside, you see about one-part "office" to every three-parts remnants of the laid-back "good-ole summertime" atmosphere of the '20s. In case you're not yet convinced of the poignancy of the scene inside, remember, 18 inches of snow blanket the grounds outside.

It is in this atmosphere that the Foothills ASA staff goes about the planning and delivery of their three main program services: special education, occupational education, and educational communications. Here, we'd like to describe the ASA's organizational characteristics and its funding parameters.

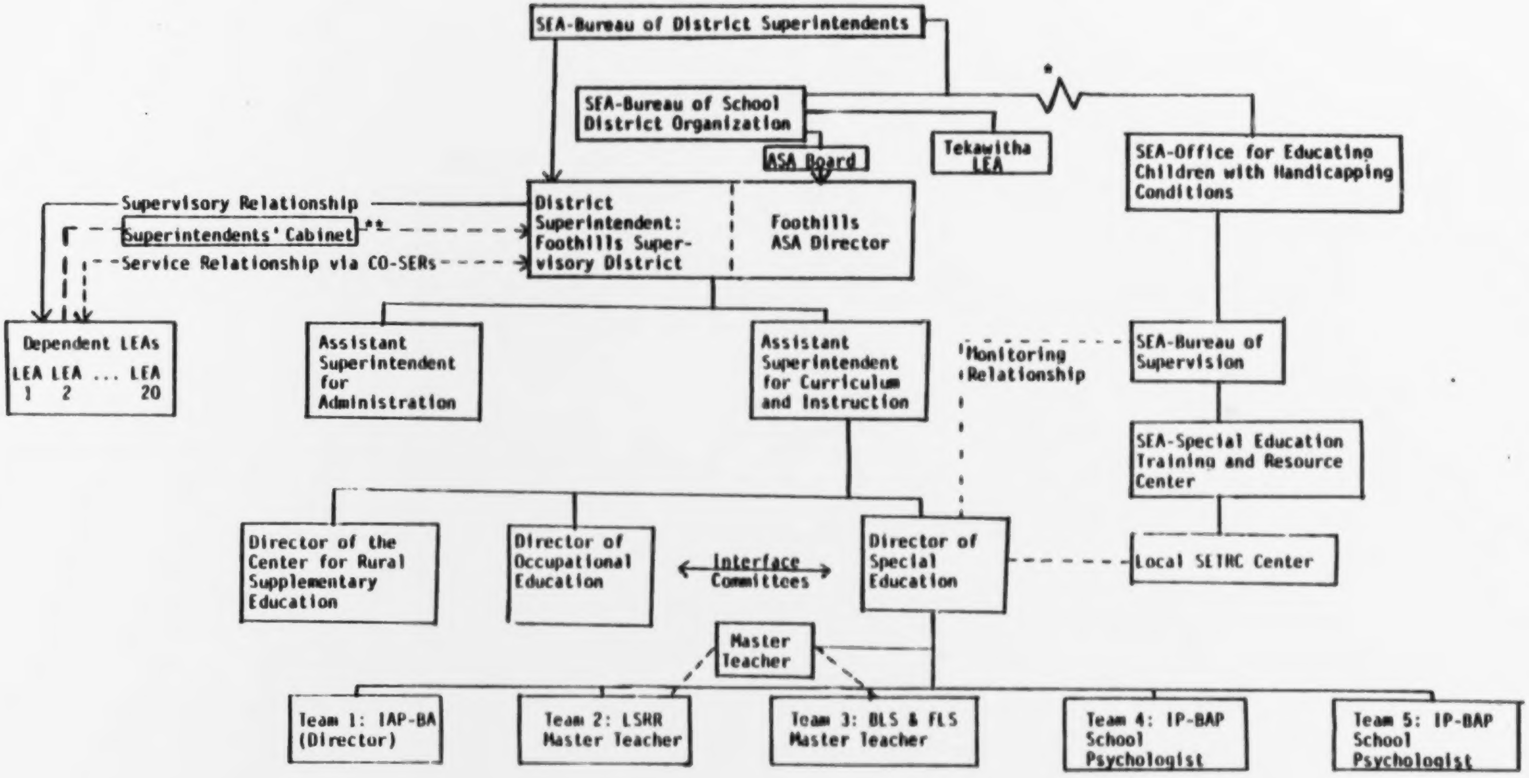
Organization and Administration

Figure 2 is an abbreviated yet inclusive ASA organizational chart presented to save 1000 words (if you believe the picture-words aphorism). The words we will use, however, should provide a feel for the complexity and chain of command of the agency.

---

[1] As we've mentioned, education is a major source of employment in the area. Fifty years ago, tourism accounted for most of the area's jobs. Ironically, many of the education employees have links to, if not offices in, the building that was once the hallmark of tourism in the Foothills area.

Figure 2: ASA Organization


SEA-Bureau of District Superintendents
SEA-Bureau of School District Organization
ASA Board
Tekawitha LEA
*
SEA-Office for Educating Children with Handicapping Conditions
Supervisory Relationship
Superintendents' Cabinet
**
Service Relationship via CO-SERs
District Superintendent: Foothills Supervisory District
Foothills ASA Director
Dependent LEAs
LEA 1
LEA 2
...
LEA 20
Assistant Superintendent for Administration
Assistant Superintendent for Curriculum and Instruction
Monitoring Relationship
SEA-Bureau of Supervision
SEA-Special Education Training and Resource Center
Director of the Center for Rural Supplementary Education
Director of Occupational Education
Interface Committees
Director of Special Education
Local SETRC Center
Master Teacher
Team 1: IAP-BA (Director)
Team 2: LSRR Master Teacher
Team 3: BLS & FLS Master Teacher
Team 4: IP-BAP School Psychologist
Team 5: IP-BAP School Psychologist

* Intervening supervisory links not relevant to special education are omitted

** Advisory Capacity

BEST COPY AVAILABLE

As mentioned, three separate SEA offices supervise and monitor the ASA: (a) the Bureau of District Superintendents supervises general education in the LEAs, (b) the Bureau of School District Organization supervises the three program areas (including special education) offered by the ASA, and (c) the Bureau for Supervision monitors ASA program compliance with the state and federal regulations for the education of handicapped students. At the juncture between state supervision and local programs is the District Superintendent/ASA Director. He is the person to whom each of the LEA superintendents reports, and he also administers the three ASA program areas, each with its own director.

The ASA Director/District Superintendent. Formally, the District Superintendent/ASA Director is responsible for the supervision of the LEAs as well as all of the services the ASA delivers to those LEAs. He executes these formal responsibilities, as well as the subtle, unwritten role requirements effectively. His experience and preparedness are not the least of the reasons for his effectiveness.

He has been an educator for over 25 years. His undergraduate work was in chemical engineering and in World War II he served in this capacity. Later, he taught mathematics and science in an adjoining state. He came to Brownsville and the Foothills ASA in 1960 after a 12-year stint as school superintendent with a metropolitan district in that state.

Administratively, the District Superintendent/ASA Director abides by the chain-of-command approach to running the ASA. Reporting to him, as shown in Figure 2, are the Assistant Superintendents for Curriculum and Instruction and for Administration. The Curriculum and Instruction unit contains Special Education, Occupational Education, and the Center for Rural Supplementary Education, each with its own organizational layers.[1]

The Director operates by the "bottom-up" principle with regard to administrative problems; that is, he insists that every effort be made to solve problems before they rise to his level. His philosophy can be summarized as ". . . have a problem? Kick it up one level and if it reaches me, it's a real problem."

The problems of running such a multifaceted agency are compounded by the Director's dual roles as boss both of the ASA and of 20 of the 21 component districts.[2] Organizational evolution has resulted in ASAs being responsible for a catchment area equivalent to the supervisory district (that is, all of the dependent districts under the supervision of the District Superintendent), potential gunpowder for less-than-competent administrators called upon to serve in both directive (Superintendent) and service (ASA Director) roles.

---

[1] The Curriculum and Instruction unit also provides a few itinerant teachers, e.g., of French, art, music, etc., whose services are shared by LEAs. This service has been omitted here for the sake of simplicity.

[2] The 21 LEAs that comprise the ASA's catchment area are referred to, organizationally, as component districts.

Indeed, the Foothills Director has seen times when some of the LEAs became fearful of his intentions. A few of the LEAs have viewed the ASA as a vehicle by which the SEA could establish control over their districts. A brew consisting of this dual role, the LEA dependency on the ASA for specialized services, and the history of school consolidation,[1] could intoxicate even the slightly insecure into a state of quasiparanoia.

However, this Director apparently has no intention of displacing the local superintendents. His administrative style suits the LEAs very well. He doesn't wield the power associated with the District Superintendent role overtly as some do, and as he could do if he wished. Instead he plays down his legal prerogatives in order to neutralize, and if necessary placate, any potential "take-over" fears on the part of LEAs. He indicated that other directors use the same strategy, as does the state ASA director. In a sense, only the meek can survive. One gets the impression that those who put the pedal to the floor of these dual-carburetor ASA/Supervisory District engines end up throwing a rod, thus rendering themselves non-functional.

The Foothills Director suggested that the "extreme degree of cooperation" among the LEA superintendents and the ASA accounts for his agency's avoidance of these inherent pitfalls. This cooperation is aided in large measure by a supportive ASA Board, consisting of nine members representing the 21 LEAs. Each of three of the Board members represents three LEAs, and only one member represents just one LEA--the largest of the 20. Even more facilitative is the Administrative Cabinet of local superintendents. Here the nuts and bolts of local and ASA needs and policies are assembled; their products are then put before the ASA Board. Both superintendents and Board members favor the arrangement. The Director likes the arrangement also; it enables him to preach and practice his operating motto: "Reasonable people, working together, can accomplish almost anything, so long as it doesn't matter who gets the credit."

The Director of Special Education. The Special Education Director's responsibilities entail the administration of all ASA services for handicapped students, including the hiring, coordination, and evaluation of ASA special education staff. His professional experience consists more of classroom jobs than administrative jobs. In fact he continues to project an orientation that is decidedly more parallel to that of teacher than of administrator. He admits that his major shortcoming in the eyes of at least one local superintendent is that he's ". . . too much like a teacher."

---

[1] The Director told us that when your town's post office, supermarket, and sundry shop get consolidated and then reside in the town down the road, the only thing you have left is your school.

Thinking "like a teacher," but employing further sub-delegation just as an administrator would, the Director has assembled five "teams," each headed by an ASA special education support person, that form (theoretically) a layer between him and the ASA special education teachers. The Special Education Director himself serves as the leader of one of the five teams, conducts training sessions for the ASA teachers regarding stress and methods to combat it and evaluates the ASA special education teachers at least every two years. Although he has created this layer between himself and his instructional personnel, the Director rarely makes a move without his teachers' input. In fact, the evaluation scheme used for teacher appraisals was designed by the teachers.

The Director created these teams to better manage his time and communication with his staff. The teams are not formal in the sense of clearly defined objectives and responsibilities. Instead they serve to enhance his ability to delegate tasks, respond to policy directives from the ASA Director, and ensure that his staff work in synchrony with one another.

His administrative philosophy is not entirely one of boxes and arrows, or adherence to textbook principles. Instead he borrows his style in part from the Chinese. On his wall is a Chinese aphorism whose orthography translated means, "crisis equals danger plus opportunity." So for example, lowering enrollment certainly signals economic dangers, but it also creates the opportunity for more flexible scheduling and staff usage.

Thus, the Director runs the special education program effectively and with a style that makes it plain that he's more like a teacher than an administrator. However, he is quick to remind you that, while such a posture enables him to keep in touch with reality, he still is responsible for administering a 1.5 million dollar program employing over 70 teachers and support staff.

The Director of Occupational Education. The Director of Occupational Education is beginning his third year in that role. He is also officed at the Foothills ASA in Brownsville. His major programmatic goal is "to make kids employable." His administrative style and activities all appear to be related to that goal.

This Director supervises a staff consisting of principals for each of the two occupational centers in the Foothills area and support personnel who, along with him, devote a large amount of time to maintaining liaison with the various employers in the area, as well as with the LEAs.

Each year the Director must file an annual report to the SEA concerning his program goals and the extent to which they are met. It is apparent, upon examination of an exemplar document, that the employability goal is paramount. For example, a recent report began with an "Economic Profile" in which data and narrative with regard to current and projected vocational placement sites are presented. The Director and his staff evidently spend a great deal of time establishing and maintaining these sites for the students.

As we shall describe in the section entitled "Service Delivery," secondary-level handicapped students also participate in occupational services through classroom instruction, work study, and/or pre-sheltered workshops. The Director indicated that, during the present academic year, he wanted at least 30 of the more than 600 handicapped students in the ASA catchment area enrolled in occupational programs and at least 15 of those in work placement sites.

The Director of the Center for Rural Supplementary Education. The CRSE Director administers services in the areas of education communications and instructional media. Also housed in the MacAdam Center, the Director heads a staff of nine that attend to television production, a media library, equipment maintenance, and film delivery.

Down the hall from the Director's office are the television studio and media library. In the studio the Television Production Coordinator produces and tapes shows with catchy names like "Brain Games" and "What's Up Doc?" which are subsequently broadcast to the local schools. The studio also receives and transmits public television programming to surrounding communities.

The media library contains books, instructional materials, films, and tapes that are lent to component districts. The Director's staff deliver and retrieve materials at LEAs at least once a week.

No direct, formal organizational ties are apparent between the Director of the CRSE and the special education program, although, as will be seen, informal ties exist.

The programs and services offered by all three arms, special education, occupational education, and CRSE, will be described in greater detail in the section entitled "Service Delivery."

Funding Policies

One comes away from an analysis of the ASA's governance patterns with one prevailing impression: that funding and operating services here are more aligned with advanced management, accounting, and fiscal practices than the typical image of rural schoolhouse bookkeeping would lead one to expect. Following is a description of the ways in which services are purchased and accounted for.

Two variables stultify any expectation of routine in format and criteria for state funding of services for the ASA and its component LEAs. The first is the state bureaucracy itself, its configuration and its effects on the ASA and component districts. The second is SEA regulatory characteristics, which describe changing (and standard) requirements for ASA/SEA functions in regard to compliance supervision as well as to provision of services.

A brief glance at the state's educational organizational chart would convince a reasonable person of its size and complexity, however, for simplicity, Figure 1 presents a skeletal version of that chart. The state is liberal in its politics and its educational expenditures; and apparently paper-work oriented in its fiscal relations with LEAs and ASAs. The Foothills ASA must contend with these regulatory regalia just as its urban and suburban counterparts do. The ASA typically runs on about five million dollars of fiscal fuel a year distributed across five budget categories, each containing multiple, non-transferable line items. In addition to its own accounting tasks, the ASA manages 59 separate budgets for the component LEAs.

This is a state that has bureaucratized to survive. Coping with its regulatory requirements in spirit and letter is no small task. The ASA copes well and with a goodly portion of hustle and class, if not with an understandable twinge of cynicism. The following description of the state's regulations for the education of handicapped students shows why such sophisticated coping skills are necessary.

Regulation 77: Evolution, Features, Monitoring

Historically, the state legislature has shown a receptive and responsive pattern of special education aid legislation, in large measure a function of strong lobbying. In 1974, a year prior to the passage of P.L. 94-142, the federal Education for All Handicapped Children Act, the state legislature passed a statute providing state aid money for the education of handicapped students. Then in 1976, the legislature enacted a series of amendments to the 1974 statute that resulted in yet a more comprehensive law which was subsequently modified by several legislative actions, and state and federal regulatory changes that spanned six years. The first of these modifications was in 1977 when the legislature required LEAs to form standing committees to identify, place, and review programs for handicapped students, and gave the SEA commissioner ultimate jurisdiction over all educational services provided to handicapped students. More refinements ensued and July, 1982 was set as a target date for all school districts to have implemented fully the requirements of this refined law, which has come to be known as Regulation 77.

The original statutory regulations of 1974 (hereafter referred to as the precursor law) were strictly categorical; that is, the education of handicapped students had been funded solely on the basis of categorical labeling. For example, the programs themselves were called LD classrooms, or EMR classrooms. But school superintendents soon communicated problems of placement inflexibility to SEA officials and discontent with the law became apparent.

Regulation 77 had its roots in a federal project examining the feasibility of non-categorical special education programs. The project gained visibility in the Foothills area and parents of handicapped and nonhandicapped students favored the delabeling tenets of this experiment initially. However, in addition to non-categorical programs, Regulation 77 also mandated a lowered teacher-pupil ratio. For example, the old regulations set class size limits for secondary level educable mentally retarded (EMR) students at 18. The new regulations reduced this ratio to 12 students (with equivalent current performance levels) per teacher. By complying with the new regulations, schools saw educational service costs grow because of the required lowering of teacher-pupil ratios. Thus, the initial support for non-categorical programs waned for many who were concerned about the increased costs of education since services provided in the new self-contained classrooms operated by the ASA meant higher costs charged to LEAs.[1]

The rationale behind this decreased class size, however, is implicitly related to the delabeling thrust of Regulation 77. Rather than serving EMR students in an EMR class per se, for example, the regulations call for the establishment of four types of self-contained classrooms and a learning strategies resource room within which students are placed based on current performance levels, as opposed to diagnostic labels. While the mixing of these diagnostic categories leads to more homogeneity in terms of learning needs, it also leads to more heterogeneity in terms of instructional programming. Thus, to compensate for the variance in instructional approaches necessary, class size has decreased.

Regulation 77 remains in force as the law governing special education programming and funding. It is generally believed to be even more comprehensive in its support of handicapped students than P.L. 94-142. The SEA monitors LEA and ASA compliance with the regulations rather stringently.

In addition to responding to telephone calls from school district officials or parents, reviewing local planning and evaluation documents, and making routine visits upon requests, the SEA's Bureau of Supervision makes in-depth site visits to each of the state's 737 school districts and 44 ASAs at least once every three years, and more often if there are problems.

Site visit teams examine ASA programs to see if children with handicapping conditions are receiving a free appropriate public education. They determine if unserved children and youth are receiving highest priority, and if previously underserved and severely handicapped students are being better served. Individualized Education Programs (IEPs) are examined and compared with the services a student is actually receiving. Parent participation in the development of IEPs, as well as the protection of the due process rights of students and their parents, including the right of confidentiality, are examined. Operation of the standing LEA-based staffing committee, including how it identifies, evaluates, and places students, is reviewed. The team also reviews student records, observes actual classroom instruction, and interviews teachers and parents. Compliance is to the SEA the minimal prerequisite for funding. As we shall see, an elaborately timed series of paperwork is necessary to document compliance.

---

[1] However, LEAs running their own programs have since found a loophole in these limitations. They place a total of more than 12 students in each class and arrange their schedules so that no more than 12 students are in the classroom at any one time.

SEA Reimbursement for Special Education Costs

Within the SEA's officialdom, a major effort is exerted to assure local compliance with Regulation 77. Compared to many, this SEA is tighter in its compliance requirements and stricter in its regulations, and it's also stronger in its lobbying efforts for the educational rights of the handicapped at the legislative level. However, the implementation of Regulation 77, which is an expanded version of P.L. 94-142 with respect to delabeling, teacher-pupil ratio requirements, and its requirement of LEA standing staffing committees, like P.L. 94-142, is predicated for now on the bureaucratic interpretation that compliance means quality.

A rather clear hint that ASAs in this state must confront complexities in budget matters may be obtained by examining literature that categorizes states according to how local districts are reimbursed for special education costs. For example, this state defies simple assignment--it reimburses on the basis of excesses in the cost of educating handicapped students, but these excesses are weighted relative to the amount and type of services provided. Thus, we see two usually distinct types of reimbursement patterns forming a hybrid: reimbursement that is based on student-weighting and on excess costs.

LEAs receive state aid to supplement their costs of general education according to total aidable pupil units. TAPUs reflect both average daily attendance figures and weighted enrollment figures. A TAPU is computed by weighting elementary education by a factor of 1.0 per student and secondary education by a 1.25 factor. "Resident" refers to the requirement that students must live in the district that counts them, regardless of where they are served. This avoids the situation in which a student is counted twice--once by the home LEA and once by the LEA that provides the services.

Handicapped students are included in the total pupil count by computing TAPUs that correspond to the amount and type of services provided as reflected in Table 2. For example, if an elementary level handicapped student receives resource room instruction more than 60% of the day, the weighted adjustment to his/her home LEA's pupil count is computed by adding the increment of 1.70 to the regular weight of 1.00, resulting in a total weight of 2.70. If the student is in a resource room less than 60 percent per day, but more than 20 percent per week, the factor is .90, resulting in a total of 1.90. Services that are provided with less frequency, such as resource room or speech services twice a week, result in a factor of .13, for a total of 1.13.

The TAPU for these various services is multiplied by the LEA's approved per-pupil operating expenditure, and this product by the LEA's aid equalization ratio; the total being the annual amount the SEA reimburses an LEA for the education of handicapped students. The latter two elements of this formula are specified on the basis of the LEA's true valuation of property wealth, computed according to assessed valuation of land, and average per-capita income. Thus, each LEA's reimbursement varies as a function of all of these factors. In general, LEAs with large numbers

Table 2 Excess Cost Increments Used to Compute an LEA's
Resident Weighted Average Daily Attendance

Placement Status	Criterion	Standard Weight	Excess Cost Increment	Total Weight
Regular Elementary	No special services	1.00	------	1.00
Part-Time Resource Room, or Speech/Language Services (Elementary)	Two Periods[1] per Week to Less than 20% of Week	1.00	.13	1.13
	20% of Week to 60% of Day	1.00	.90	1.90
Self-Contained Classroom Services (Elementary)	60% of Day (minimum)	1.00	1.70	2.70
Regular Secondary	No special services	1.25	------	1.25
Part-Time Resource Room, or Speech/Language Services (Secondary)	Two Periods per Week to Less than 20% of Week	1.25	.13	1.38
	20% of Week to 60% of Day	1.25	.90	2.15
Self-Contained Classroom (Secondary)	60% of Day (minimum)	1.25	1.70	2.95

[1] The SEA defines a "period" as a minimum of 30 minutes

of handicapped students will generate a higher share of state aid than will those with fewer handicapped students.

If a handicapped student's program is priced at greater than four times an LEA's approved operating expenditure per pupil, or greater than $10,000, the aid falls in the "high cost" category. In such a case, an LEA would request this aid category and the SEA would approve, given documentation of appropriate diagnostic classification.

In the main, LEAs use these funds for ASA special education services. However, LEAs can contract with other LEAs, running their own programs, to provide special education services. The home LEA pays for these services in the same way it would pay the ASA. In either case, the agency providing the service charges tuition to the home LEA. The state reimburses the LEA according to the formula discussed above. The ASA serves as broker by handling the accounting and other administrative tasks associated with the particular agreement.

Sources of ASA Funds for Special Education

The state reimburses for all costs in excess of those expended on the nonhandicapped student. Thus, if the ASA operates programs for an LEA's handicapped students, the LEA receives state aid of no less than 35 percent and no more than 90 percent of the costs for these services. Theoretically, the LEA receives this reimbursement from the SEA and pays those dollars to the ASA. In actuality, however, the ASA, as part of its administrative services to the component districts, handles the accounting involved in these matters in much the same way a bank would receive one's paycheck and pay one's bills. These accounting services are termed "administrative services."

All component districts share in the costs of ASA administrative overhead on a pro rata apportioned basis regardless of the extent to which they participate in ASA program services. All 21 LEAs pay a continuous monthly fee for ASA administrative costs, which include salaries for ASA administrative staff, legal expenses, printing, and the computing of census and fiscal data.

ASAs receive state aid in proportion to amounts LEAs are capable of paying relative to their tax base. State aid cannot exceed 70 percent of an LEAs total operating costs, nor can it be applied to ASA administrative costs. The state's share is determined per LEA by one of three methods:

a. The millage formula is usually preferred by districts with high tax rates. Under this formula, a component district's share of the ASA administrative service cost equals the amount which is in the same proportion to the total cost as a fixed mill tax (determined by the State Legislature) is to the district's computed tax rate for the year. Currently the tax is 8 mills. The amount remaining after the component district's share is deducted becomes the amount of state aid.

b. An alternative formula, based on the state aid ratio, furnishes an amount of state aid which is equal to the total approved ASA cost to a component district multiplied by the district's state aid ratio for the current year.

c. A component district can accept an amount not less than that apportioned by the State for the district's ASA aid during the 1967-1968 school year. This is known as a save-harmless provision.

Generally, the method yielding the greatest reimbursement is selected. Seven LEAs use the 8-mills formula; eight have chosen to be reimbursed according to the state aid ratio. Six LEAs utilize the save-harmless provision.

Timeline for Service Agreements

Reimbursements to districts from the SEA for ASA program and administrative services are made a year after expenditure. This is nothing new, however; the state has reimbursed districts for general education services in this fashion for many years. The ASA fulfills the role of broker[1] for and provider of services needed by LEAs. To maintain some semblance of order, the state requires adherence to an elaborate set of checks and balances in terms of the timeline shown in Table 3. This schedule guides the mechanism described above. Adherence to it is a bureaucratic and programmatic necessity.

Table 3 shows a summary of events and corresponding deadlines comprising the schedule within which component LEAs apply for and receive services. Also depicted is the timeframe in which ASAs file their own program proposals with the SEA and receive approval.

It can be seen that LEAs must first submit a general proposal for program services for the following fiscal year with the ASA by October 1st. ASAs then file their own proposals, based upon LEA requests, with the SEA within 30 days. A month later, ASA five-year plans are submitted. Although they project service needs of the area across five years, they are turned in to the SEA annually. By December 15th, the state notifies the ASA concerning the status of its program proposal, and immediately thereafter ASAs notify component LEAs.

On January 15th LEAs submit specific requests, called CO-SERs (Cooperative Service Agreements),[2] to the ASA. These in turn are

---

[1] There is some disagreement as to this brokerage role. Yet, in the true sense of the word, it is one of ASA's functions. In fact, as has been mentioned, the ASA can arrange for one LEA to receive program services from another ASA.

[2] CO-SERs are agreements for program services involving two or more LEAs within the ASA. If an LEA in one ASA and a neighboring LEA in an adjacent ASA desire shared services because of proximity convenience, the two ASAs arrange a "Cross-Contract" which sets forth an agreement as to the extent of services and costs each party provides and bears.

TABLE 3

TIMELINE FOR SERVICE AGREEMENTS

Item	Filed by
New Program Proposals	
LEAs file new program proposals with ASA	October 1
ASA files new program proposals with SEA	October 31
ASA files long range plan (five year plans) with SEA	December 1
SEA notifies ASA of approval/disapproval; ASA notifies LEAs that requests for approved services are due	December 15
Requests for Services	
LEAs submit provisional Cooperative Service Agreements (CO-SERS, or requests for services) to ASA	January 15
ASA files annual operating plan with SEA (based on (CO-SERS)	February 1
SEA notifies ASA of operating plan approval/disapproval; ASA notifies LEAs of approval/disapproval of service requests (possibly amended)	March 15
Service Commitments	
LEAs file commitments for requested service with ASA	April 1
ASA annual board meeting and budget hearing	April 1 - April 10
ASA adopts budget files with SEA	May 15
ASA files base contracts with SEA	August 1
Amendments to Operating Plan (Increased Participation Only)	
Filed by LEAs with ASA	May 1 - August 1
Supplemental contracts filed by ASA	30 days after execution
ASA Files Program Report and Evaluation with SEA	December 1

collectively submitted to the state 15 days later in the form of an Annual Operating Plan. By March 15th, the state informs the ASA of the status of the plan and the ASA notifies LEAs of the status of the CO-SERs. In general CO-SERs are approved or amended depending on the guidelines for the services requested and the capabilities of the ASA to provide the requested service.

On April 1st, LEAs must commit themselves to (that is, consummate or reject) the service agreement. Service agreements are rarely rejected. LEAs who do back out of a particular agreement do so because of prohibitive costs even with state aid. Sometime between April 1st and 10th, the ASA holds its annual Board of Directors meeting and budget hearings. Here, LEA representatives on the ASA board can scrutinize and have input regarding the proposed budget.

By May 15th, the ASA finalizes the budget based on Board input and submits it to the SEA. During the interim between May 15th and August 1st, ASAs have the option of amending their CO-SERs. However, these changes must be in the form of increased participation in approved ASA services. Previously unused services can be requested only on January 15th.

On August 1st, the ASA must file Base Contracts (reflective of agreed upon services via the CO-SERs) with the SEA; and, up to 30 days after SEA approval of these, the ASA submits Supplemental Contracts (reflective of adjustments to Base Contracts) to the SEA. By September 1st, the ASA is required to turn in to the SEA a Program Report and Evaluation of the past fiscal year's activities. A month later, it all begins again.

SERVICE DELIVERY

The Evolution of and Rationale for the ASA

The ASA owes its origin to a state legislative enactment (the Intermediate School District Act) authorizing the formation of intermediate school districts. Passed in 1947, the act was aimed at enabling small rural school districts to combine their resources to provide services that otherwise would have been uneconomical, inefficient, or unavailable.

ASAs were intended to be temporary means by which a careful transition could be made to this intermediate district framework. Though its purposes were similar to those of the proposed intermediate districts, the ASA was conceived and written into the state law because many LEAs were adamantly opposed to intermediate districts. They feared their own discretion and autonomy would be threatened. ASAs were a bit more palatable since, unlike the intermediate districts, they could not own property and, thus, could not invoke eminent domain, nor could they tax.

Although the original form of this legislation (i.e., mandatory intermediate districts) was rejected, an amendment allowing two or more LEAs within a supervisory district to share services via an ASA-type arrangement was passed. As one state planner put it: this "created [in effect] a hunger" for the services that ASAs could provide. This opportunity coupled with the LEA distaste for the intermediate district concept started ASAs on their way to becoming a permanent rather than a temporary speck on the state organizational map.

Simpler in structure and less autonomous than the projected intermediate districts, the ASAs were seen by citizens as worthy of being an end in themselves, not merely transitional means. Not one intermediate district was ever formed; in 1972 the Intermediate School District Act was repealed. Laws relating to the ASA, however, have remained on the books. Thus the ASA has developed from a special-purpose, temporary agency into a formally recognized middle or intermediate unit in the state's public educational system.

No fewer than 82 ASAs were in existence during the late 50s. Retirements of District Superintendents/ASA Directors and accompanying supervisory district consolidations reduced these to the 44 now operating. This consolidation pattern was paralleled in scope by the consolidation of LEAs that occurred so quickly that by the mid-'50s, 7500 LEAs had shrunk to 900. While consolidation led to larger numbers of students per LEA, rural LEAs were still not able to offer a full range of services. Thus, the ASAs remained virtually indispensible.

For state administrative ease, all ASAs are coterminous with supervisory districts which have been in existence since shortly after the turn of the century. At the time ASAs were established, District Superintendents were also made responsible for directing ASAs. It already has been noted that this put District Superintendents/ASA Directors in an obvious role conflict: supervisors of the very LEAs they are to assist. One wonders if the state didn't anticipate waves of resignations and retirements in the wake of this "our man/their man" predicament that the District Superintendents/ASA Directors found themselves in. As vacancies occurred, the SEA Commissioner exercised his legal prerogative to consolidate the supervisory districts. If the state's overt or hidden agenda included consolidation, its wish was certainly fulfilled.

Table 4 shows this pattern of consolidation across a 39-year period, during which 208 supervisory districts have become 44.

Table 4

Changes In Numbers of Supervisory Districts/ASAs: 1933-1982

Year	Number of Supervisory Districts	Number of Area Service Agencies (ASAs)
1933	208	0
1943	190	0
1953	152	51
1958	121	82
1963	86	74
1967	62	59
1970	55	55
1976	45	45
1982	44	44

In the Foothills area, eight Supervisory Districts became four; and, by 1968, one district with two boards! Then, in 1970, one unified board was formed.

The current geographic configuration of the Foothills ASA is somewhat resistant to logic, however. The Director apparently tried to persuade the state to establish the ASA along county lines, but the state elected to split the line of responsibility across county lines; indeed, the Foothills ASA serves LEAs in parts of six different counties. Figure 3 is a map of the Foothills Supervisory District. One notes that within this six-county area, the ASA's location in Brownsville is relatively central. However, LEAs such as Halltown report that, at times, contact and communication with the ASA is hampered in part by the distance factor.

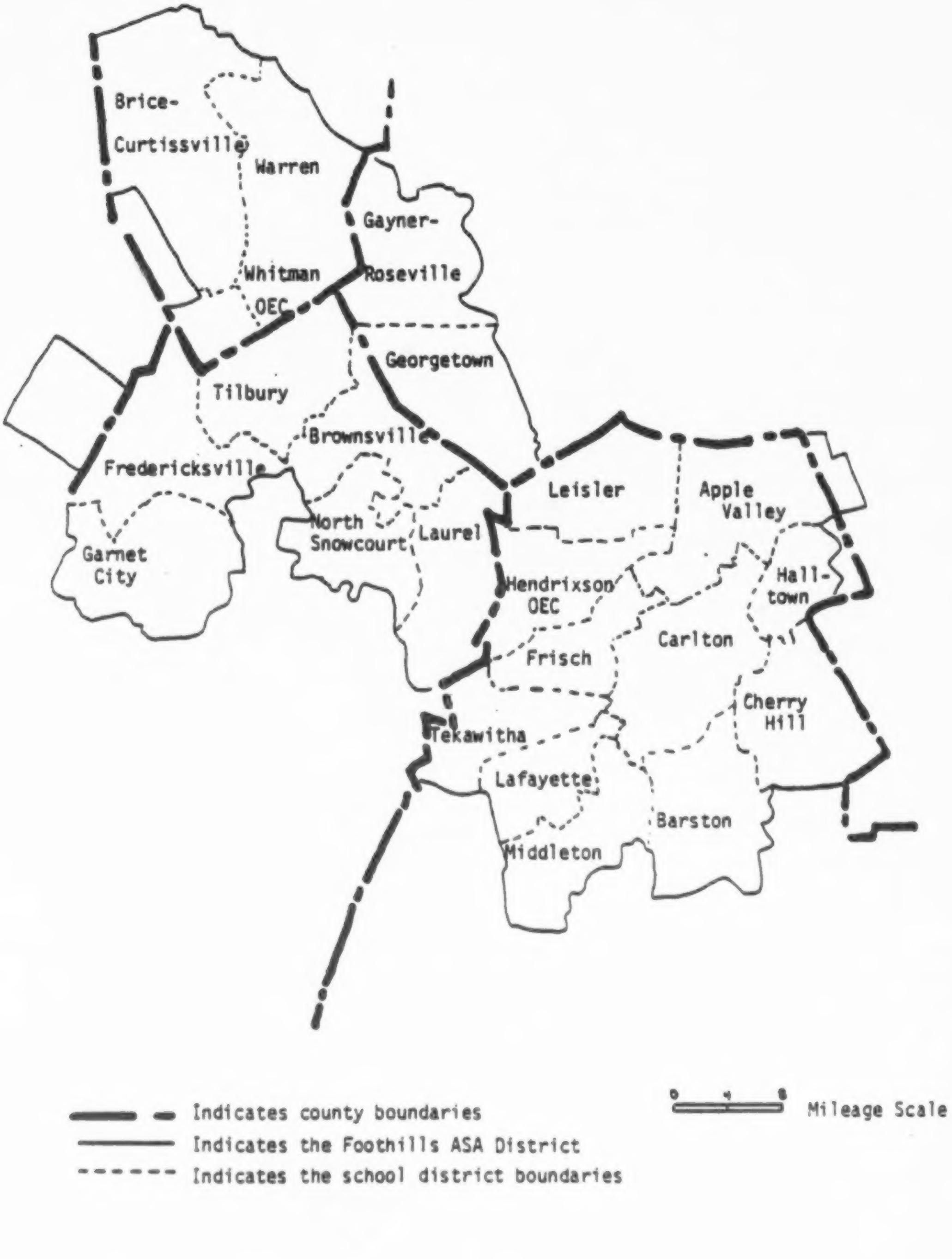
The need for communication between the ASA and its component LEAs is better understood by becoming familiar with the services the ASA provides and how it goes about the business of providing them. We begin by describing the services offered in special education, followed by those of occupational education, and the CRSE.

Special Education: Programs and Personnel

Originally, ASA service delivery virtually overlooked the handicapped. In the 60's, accounting and itinerant services overshadowed special education. However, concern was growing nationally regarding

Figure 3

Foothills Supervisory District/ASA Region


Brice-
Curtissville
Warren
Gayner-
Roseville
Whitman
OEC
Georgetown
Tilbury
Brownsville
Fredericksville
Leisler
Apple
Valley
North
Snowcourt
Laurel
Garnet
City
Hendrixson
OEC
Hall-
town
Carlton
Frisch
Cherry
Hill
Tekawitha
Lafayette
Barston
Middleton
Indicates county boundaries
Indicates the Foothills ASA District
Indicates the school district boundaries
0 4 8
Mileage Scale

the rights of handicapped persons to treatment, and, specifically, the rights of handicapped children to a free appropriate public education. In the early '70s, the winds of a federal law for handicapped children and attendant services began to gust across the state, leading legislators to pass a state law (the precursor to Regulation 77) mandating educational services for handicapped students. Currently, the major services offered in Special Education by the ASA in response to Regulation 77 and P.L. 94-142 include:

(a) Special education resource and self-contained classes;

(b) Psycho-educational testing and referral (for further diagnosis) of students in ASA and LEA special education programs;

(c) The Special Education Training and Resource Center (SETRC) which provides consultant services, materials, training and programs to teachers, administrators, parents and others involved with the education of handicapped children;

(d) Counseling of teachers, administrators, other school personnel on problems related to handicapped children;

(e) Rendering advice on state laws and regulations (and interpretations of same) with regard to services to the handicapped;

(f) Rendering advice and assistance in obtaining financial assistance under legislated programs;

(g) Programs and presentations regarding special education, educational testing and related topics to PTA's, school faculties, civic and social groups; and

(h) Information on community and state agencies who regularly serve handicapped children.

Although the ASA offers these services to all component LEAs, several LEAs have chosen to provide resource programs and/or school psychological services themselves. Table 5 shows how programs are distributed across the LEAs. It can be seen that 14 LEAs, which do not provide their own instructional services, have ASA classrooms located in their buildings. Three LEAs, which have neither an ASA nor an LEA program housed in their buildings, arrange for the transportation of their handicapped students to neighboring LEAs within the ASA. Three LEAs arrange for the Foothills ASA to cross-contract with the neighboring Mountainside ASA so that handicapped students can be served in an adjacent LEA located in the Mountainside Supervisory District. Three of the larger LEAs house both their own and ASA resource rooms. One LEA has its own resource room and no ASA classrooms.

With regard to support services, four LEAs have employed their own school psychologists, although two of these LEAs share the services of one of these psychologists. Nineteen share ASA speech/language therapy services and six share the services of the Visual Impairment Itinerant teacher.

Table 5: Distribution of ASA and LEA Special Education (SPED) Personnel Across Component LEAs

LEA	Distance in miles from ASA	Total '81 Enrollment	ASA SPED Teachers[1]	LEA SPED Teachers[1]	Shared ASA School Psychologist?	LEA School Psychologist?	ASA Visual Impairment Itinerant?	Shared ASA Speech/ Language Therapist?	Other ASA Personnel
Garnet City	40	230	1 (EMR)	0	No	Yes	No	Yes	2 art teachers, 1 dental hygienist, 1 guidance counselor, and 1 music teacher
Laurel	25	540	0	0	Yes	No	No	Yes	None
Apple Valley	40	470	1 (Resource Room)	0	Yes	No	Yes	Yes	1 French teacher, 1 guidance counselor, 1 industrial arts teacher, and librarian
Carlton	40	1173	2 (EMR, TMR)	1 (LD Specialist)	Yes	No	Yes	Yes (2)	None
Borston	72	555	0	1 (Resource Teacher)	No	No	No	No	None
Gaymer-Roseville	12	457	1 (Resource Room)	0	Yes	No	Yes	Yes	1 music teacher, 1 dental hygienist
Brico-Curtisville	56	506	1 (Resource Room)	0	Yes	No	No	Yes	1 art teacher
Georgetown	16	263	1 (Resource Room)	0	Yes	No	No	Yes	1 dental hygienist, 1 librarian, 1 music teacher, 1 physical education teacher
Lafayette	56	480	1 (Resource Room)	0	Yes	No	No	Yes	None
Fredericksville	40	611	2 (EMR Classes)	1 (LD)	No	Yes	No	Yes	1 guidance counselor, 1 music teacher
Hendrixson	40	411	1 (EMR)	0	Yes	No	No	Yes	1 dental hygienist
Middleton	43	529	1 (Resource Room)	0	Yes	No	No	Yes	1 art teacher
[illegible]	60	2221	11 (3 Emotionally Handicapped, 4 EMR, 2 Multiple Handicapped, 2 Resource Rooms)	6	Yes	Yes	Yes	Yes	DATA NOT AVAILABLE
Tilbury	20	438	0	0	Yes	No	No	Yes	1 art teacher, 1 remedial reading teacher 1 home economics teacher
Frisch	12	458	1 (Resource Room)	0	Yes	No	No	Yes	None
North Snowcourt	16	493	3 (Resource Room & 2 EMRs)	0	Yes (2)	No	Yes	Yes	None
Helltown	60	282	1 (Resource Room)	0	Yes	No	No	Yes	1 art teacher, 1 dental hygienist, 1 French teacher, 1 librarian, 1 industrial arts teacher, 1 guidance counselor
Brownsville	-	524	3 (2 EMRs and Educationally Handicapped)	0	Yes	No	Yes	Yes	None
Warren	56	498	2 (Resource Room)	0	Yes	No	No	Yes	None
Leisler	12	458	2 (Resource Room & EMR)	0	No	Yes	No	No	1 art teacher
Merry Hill	56	530	0	1	Yes	No	No	Yes	None

---

[1] Terms denoting special education programs are variant. We assume each LEA has used its own terminology.

[2] The ASA and LEA Psychologist is the same individual.

[3] The Leisler LEA [illegible]

BEST COPY AVAILABLE

ASA special education services are delivered under the conscientious and watchful eye of the Director of Special Education, five teams of service providers, a cadre of 41 teachers,[1] and the SETRC training/consultation specialist. The Director's role has been described and descriptions of the roles of the teams, their leaders and the roles and functions of ASA teachers will follow the present discussion of special education programs.

Instructional Programs for Handicapped Students

The Foothills ASA employs a total of 41 teachers to provide direct special education services to 415 ASA-served students in the supervisory district. These teachers along with support personnel deliver services that are non-categorical in nature. Although the students are still classified according to traditional diagnostic categories (mildly mentally retarded, learning disabled, emotionally disturbed, etc.), they are placed in non-categorical programs whose titles more accurately describe what the programs do, in line with the intent of Regulation 77.

Classroom personnel are distributed across the following five programs: (a) Learning Strategies Resource Rooms (LSRRs), (b) Individually Paced Basic Academic Programs (IPBAPs), (c) Individual Academic Programs Emphasizing Behavioral Adjustment (IAP-BA), (d) Basic Life Skills (BLS), and (e) Functional Life Skills (FLS). Table 6 summarizes ASA enrollment data per program.

Learning Strategies Resource Rooms. These classrooms are of the non-categorical resource room variety serving 210 students--principally those diagnosed as learning disabled. This service model had been the primary vehicle for serving mildly handicapped students by providing part-time (20 percent of the week to 50 percent of the school day) instruction in the resource room and mainstreamed instruction in the regular classroom. Regulation 77 opened the door for the non-categorical twist to this resource model and, ostensibly, students who have been classified as learning disabled or mildly retarded are placed in such classes by LEA staffing committees (the full operation of these committees is discussed in this section under the general heading, "Student Staffing"). The local and national emphasis on the needs of secondary learning disabled students has made this service model even more attractive.

Fourteen full- and part-time resource teachers and two aides are employed to run the LSRRs in 12 of the 21 component LEAs with a teacher-pupil ratio of 1:17.5; however, at any one time, teachers typically work with students individually. In addition, four of the LEAs have established their own resource programs, with initial assistance from the ASA. The remaining four LEAs arrange transportation for their handicapped students to adjacent LEAs that house their own or ASA programs. The Team Leader

---

[1] The number 41 includes, in addition to the 35 ASA teachers shown in Table 5, other teachers not located in LEA facilities and thus not listed in the table.

Table 6

BASIC DATA ABOUT ASA SPECIAL EDUCATION PROGRAMS

Program	Mainstreamed or Self-Contained?	Pupil Enrollments				Class-rooms	Personnel		Ratios	
		Elem	Jr. Hi.	Sr. Hi.	Total		Teachers	Aides	P/T[4]	P/A[5]
Learning Strategies Resource Room (LD/EMR)[1]	M	74	105	31	210	16	14[3]	2	17.5	15.0
Individually Paced Basic Academic Program (EMR/LD)[2]	SC/M	57	28	51	136	17	16[6]	10	8.5	5.2
Individual Academic Program Emphasizing Behavioral Adjustment (ED)	SC	19	5	4	28	4	4	3	7	4
Basic Life Skills (TMR)	SC	10	8	14	32	3	5	2	6.4	4.6
Functional Life Skills (SMH)	SC	3	-	6	9	2	2	3	4.5	1.8
Total	-	163	146	106	415	25	41[7]	20	-	-

1 - Serves primarily learning disabled (LD) students, and some educable mentally retarded (EMR) students.
2 - Serves primarily EMR students, and some LD students.
3 - Four teachers are half-time.
4 - Pupil/teacher.
5 - Pupil/adult.
6 - One teacher is half-time in each of two classrooms.
7 - The Visual Impairment Itinerent is not included in this total

BEST COPY AVAILABLE

(the Master Teacher) consults with ASA and LEA resource teachers, but supervises only the ASA resource teachers. In parallel fashion, the Special Education Director evaluates only the ASA resource teachers. LEA administrators evaluate LEA resource teachers.

The ASA's LSRR model is typical of the resource room model nationally, as are the advantages and disadvantages implicit in the model. Students spend at least half of the day in regular classrooms and may spend as much as 80 percent of the week in regular education programs. In a few cases instructional focus at the elementary level centers on basic skills remediation; while at the secondary level, resource teachers devote much of their time to tutoring students in their regular curriculum subjects. As such, some instructional approaches are not consistent with what the name of the program, Learning Strategies Resource Room, implies. However, many of the LSRR programs do abide by the "strategies" approach as has been advocated of late in the literature--especially for secondary students who, many believe, need to learn how to learn rather than receive more of the same in terms of remedial or tutorial instruction.

Commensurate with the resource model, of course, is mainstreaming--the practice of placing mildly handicapped students in the regular classroom, ostensibly facilitating instructional and social integration with their nonhandicapped peers. As in any school organization, the Foothills resource teachers report both advantages and disadvantages in the model's implementation. Instructional and social integration can improve a student's self-image and social competence. This advantage is reported not only by ASA teachers, but by proponents of mainstreaming across the country. However, as many of the ASA teachers told us, this socialization advantage is predicated on the degree to which regular and special educators communicate; when their respective interests and programmatic activities are at loggerheads, a number of outcomes result--all disadvantages so far as the welfare of the mainstreamed student is concerned.

Generally, an obvious disadvantage can be a disjointed program in which the student does little in the resource room that relates to the regular class, and thus is put in a situation some call "dumping"--mainstreaming for the sake of the requirement that the student spend a portion of time in the regular class. In these cases, regular classroom teachers resent the student's presence and special education teachers resent regular classroom teachers. From the student's perspective, an overwhelming, incomprehensible, no-win situation results.

However, the smallness of many of the Foothills LEAs actually reduces the likelihood of such a dire situation. In most cases, both regular educators and special educators are aware of the concerns each brings to bear on the mainstreaming issue. Regular teachers perceive themselves as lacking the skills to work and cope with handicapped students, even given the national and local emphasis on staff development. Special education teachers know they are the ones upon whom the onus lies to open channels of communication. Yet even with such awareness, neither camp is fully able to bring about a resource room model that works in practice the way it was intended. Is it possible that the "mandate" of regular class placement itself hinders the viability of the model to integrate students successfully?

Individually Paced Basic Academic Programs. The IP-BAPs are one of four types of self-contained classrooms created in compliance with Regulation 77. The idea behind these self-contained programs and the LSRR described above is to maximize the continuum of services available to handicapped students. Although most students placed in IP-BAPs are diagnosed as mildly mentally retarded, the IP-BAPs, like the LSRRs, technically are non-categorical. Students placed in IP-BAPs, regardless of their diagnostic classification, must be deemed by the staffing committee in their home LEA as needing full-time instruction in a special education classroom.

Sixteen full- and part-time ASA teachers along with 10 aides comprise the two IP-BAP teams, each led by an ASA school psychologist. These personnel provide direct instructional services to 136 students in 17 classrooms, including one classroom each at the two occupational centers and 15 in seven LEAs. One of the teachers has two classrooms: he teaches at the Brownsville LEA in the morning and the Whitman Occupational Center in the afternoon. None of the LEAs provides its own program; four LEAs transport students to adjacent LEAs with IP-BAPs. The teacher-pupil ratio is approximately 1:8; and the adult-pupil ratio (including aides) is approximately 1:5. The limit within Regulation 77 is 1:12. Thus, in terms of real numbers, ASA staff-student ratios are more than acceptable.[1]

IP-BAP instruction is geared toward basic academic and social skills. Teachers emphasize reading, mathematics, language, and career/vocational skills all in the self-contained setting. Often, they arrange on an individual basis for students to attend music, homemaking, shop, art, physical education, and library, as well as some academic activities with their nonhandicapped peers.

Thus, the IP-BAP classrooms are intended to provide students with self-contained instruction and require no regular classroom instruction in academic areas. However, some academic mainstreaming does take place. One ASA staffer indicated that nearly 80 percent of the IP-BAP students do receive mainstreamed instruction in at least one academic subject area.

One would expect fewer problems with this self-contained model, however. It does not require academic mainstreaming, and hence regular teachers are not put in the position of working with students whose learning needs they perceive as beyond their own instructional expertise. Instead, in the case of the IP-BAP program, regular and special educators are brought together out of choice. Although the special educator still must open the door, he or she does so with a key, not a mandate. One regular classroom teacher added that the onus is not completely on the special educator. She indicated that the significant factors predicting the success of a mainstreamed student revolve around the regular educator's "sensitivity, tolerance, and equilibrium."

---

[1] Some local programs serve a total of more than 12 students by arranging part-time placements so that a given teacher works with more than 12 students during the school day, yet no more than 12 at one time.

Individual Academic Programs Emphasizing Behavioral Adjustment. IAP-BAs are the second type of self-contained classroom. Operationally, they tend to include students labeled emotionally disturbed or behaviorally disordered. Four teachers and three aides work with 28 students in four locations, three of which are in the largest LEA. The teacher-pupil ratio, 1:7, is within the limit of 1:10 set by Regulation 77. The adult-pupil ratio is 1:4. No LEA operates its own IAP-BA program. There are two primary-level programs, one intermediate, and one secondary program. The student's home LEA arranges for his/her transportation to the class appropriate to his/her age.

Programmatically, emphasis is placed on academic instruction that parallels that of the regular curriculum. Students for whom all of the usual attempts at behavior management have been exhausted typically are referred for possible special education services. And, diagnosed as emotionally handicapped, these students are placed in the IAP-BA program. The low teacher-pupil ratio is designed to permit intensive remediation of behavioral problems and, more importantly, the teaching of new behaviors that reflect more appropriate self-expression.

One of the IAP-BA teachers indicated that although the class size limit is 10, five is an optimal class size. These are students, according to this teacher, who have been through the discipline mill, and the students' home districts believe they need a "special environment." Thus, some administrators apparently consider the program one of "confinement" rather than promise.

Yet, the management of mainstream experiences depends upon student needs and teacher variables. Within a climate of cooperation IAP-BA teachers carefully orchestrate mainstreaming arrangements. In some cases, mainstreaming is used as a reward for good behavior. One of the five students in the secondary program is mainstreamed in a regular Earth Science class.

The Special Education Director acts as the IAP-BA Team Leader, and although he spends less time than he would like in his Team Leader role, the Director has been able to increase his "drop-in" visits and consultation activities with the IAP-BA teachers.

Basic Life Skills and Functional Life Skills. The Master Teacher serves as the Team Leader for the BLS and FLS programs--the third and fourth types of self-contained programs. BLS and FLS programs serve moderately retarded and severely/multiply handicapped students, respectively.

The BLS program serves 32 students in three locations: at the Palmer Center, a community building in Brownsville; at the Carlton LEA; and at Mt. Pleasant, a self-contained school in the Lafayette LEA. Five teachers and two aides run the programs, resulting in a teacher-pupil ratio of a little over 1:6 and an adult-pupil ratio of 1:4.6--the latter under Regulation 77's requirement of 1:12. The FLS program serves nine students with two teachers and three aides. One FLS program is located at the Lakeside School; the other at the Spring School. The resultant 1:4.5 teacher-pupil ratio and 1:1.8 adult-pupil ratio are under the required 1:6. All BLS and FLS programs are self-contained.

The BLS program stresses basic rudiments of arithmetic and survival vocabulary skills as well as social and self-help skills. Secondary level students receive pre-sheltered and sheltered workshop experiences through ASA and ARC collaborative programs. The research team visited one BLS classroom in which the students were engaged in purposeful object sorting and assembly activities. The teacher indicated that although many of these tasks are preparatory, she occasionally can get a contract from a local business for piece work.

The FLS program stresses basic self-care skills and self-initiated communication. The severity of the students' handicaps are often compounded by physical disabilities such as cerebral palsy and spina bifida. Support services in the way of occupational therapists and physical therapists are available from a regional hospital when needed; however, the ASA does not employ full-time physical or occupational therapists.

Support Services for Handicapped Students

Support services provided by the ASA include: (a) school psychological services, (b) an itinerant teacher of the visually impaired, (c) speech/language and hearing services, and (d) training and consultation for ASA staff, LEA staff, parents, and Board of Education members, provided by the Special Education Training and Resource Center housed at the ASA.

School Psychological Services. Three of the LEAs hire their own school psychologists. The rest share the services of two of the seven ASA school psychologists. The primary responsibility of these individuals is to conduct psycho-educational testing, usually as a result of a referral. As will be described later in this section, the psychologist provides the necessary data from psychological tests that the staffing committees use in determining whether to place a student in a special education program and, if so, which one. In addition, the psychologist functions as a resource for teachers, suggesting management and instructional techniques in much the same manner as the Master Teacher.

Itinerant Teacher of the Visually Impaired. The itinerant teacher of the visually impaired is responsible for:

a. Interpreting the needs of the children to school administrators, nurses, teachers, and parents.

b. Scheduling and conducting instructional sessions with consideration toward the needs and capacities of the child within the framework of state law and regulations and ASA policies.

c. Using special materials, equipment and aids made necessary by the child's handicapping condition, teaching the specific skills needed to effectively use these special materials, equipment, and aids.

d. Developing Individual Educational Plans for each student.

Students with whom the itinerant teacher works are those who meet one of the two following criteria as specified in Regulation 77:

a. Visually Impaired - a legally blind child with a visual capacity of 20/200 or less in the better eye with the best correction, or a field of vision restricted to a 20 degree arc.

b. Partially Sighted - a child whose visual acuity in the better eye with best correction ranges between 20/70 and 20/200, including those children who can still function capably with their residual vision and who have a medically indicated visual loss or a recurring serious medical eye problem affecting acuity and operable eye diseases.

Speech/Language and Hearing Services. Most LEAs share ASA speech/language therapists. Therapists work with speech impaired students from two to five times a week for 30 minute sessions. Like speech impaired students, hearing impaired students are placed in regular programs and receive support services from specialists hired according to needs by LEAs. The ASA has no hearing specialists on board.

Special Education Training and Resource Center

Staff development through inservice training and the dissemination of resources is provided by the Special Education Training and Resource Center (SETRC). This SETRC is one of a state-wide network of 51 Centers funded by the state's Bureau of Program Development (Office for Education of Children with Handicapping Conditions). The idea and concept for the project emerged from the original Instructional Materials Center network in the state. In operation for a little over 10 years, SETRC's budget is devoted largely to training "decision-makers," that is, administrators, staffing committee members, hearing officers, and board members; and service providers, that is, regular and special teachers and parents. SETRC services include:

a. Training - Workshops are offered on a variety of topics including sign language, advocacy, behavior management, laws and regulations, learning and teaching styles, and mainstreaming of handicapped children.

b. Library - A library of instructional materials, professional resources, and resources for parents, is maintained.

c. Consultation - Consultative services include: special education and related services available locally for the handicapped, effective curricula, information about computer search requests, and current laws and regulations.

d. Information Dissemination - SETRC distributes a bi-monthly newsletter, brochures, newsbriefs, and copies of state laws and regulations. Materials are sent to individuals upon request.

SETRC personnel at the state level train decision makers to better implement the tenets of Regulation 77 with respect to the staffing of students, due process, and placement practices. Decision makers receive direct taining, that is, they are trained directly by the state level SETRC staff.

From the state level SETRC perspective, local service providers (teachers, parents) receive "indirect" training. Here, local SETRC staff use content and material developed by the state level SETRC office to conduct the training. Thus, locals are trained "indirectly" by the state level SETRC office via the local SETRC staff. Local SETRC staff are trained by state level staff to deliver the prepackaged content.

Essentially, training needs are established at two levels: state and local. Of the nine Foothills SETRC training objectives, seven are mandated statewide needs, while two are locally-based. From the statewide perspective, regular education inservice needs are comprised of the perfunctory "knowledge, skills, and attitudes." Yet, as one state department official told us, "attitudes" are the key need in terms of regular educators' contributions to special education.

Most of the training is done through instructional modules developed by the state SETRC office. An exemplar module would include printed materials pertinent to the topic, as well as a resource bibliography of materials and resources available in the local SETRC library.

SETRC and local colleges collaborate to provide training. The colleges provide professors, facilities, and credit; SETRC, the content and technical assistance. Students pay tuition on a credit hour basis. Credit is available on an inservice basis, i.e., credit toward graduated salary steps, or on an access basis, i.e., for anyone interested.

Recently, the SETRC network has taken on a new task. An interesting deployment/training problem has arisen over the past several years with respect to teachers of visually impaired and hearing impaired youngsters. In the past, these students were served at state residential schools. The respective populations, however, tended to be high-functioning (i.e., average or bright students who happened to have a sensory disability). Lower-functioning students with visual and hearing disabilities (i.e., multiply handicapped; typically, moderately to severely mentally retarded with concomitant visual and/or hearing handicaps) were housed at state facilities for the mentally retarded. With the advent of deinstitutionalization, Regulation 77, and P.L. 94-142, both the low-and high-functioning populations have taken a step closer to the mainstream: high-functioning visually impaired and hearing impaired students are now served in their local districts and low-functioning students have been moved from state residential facilities for the mentally retarded to the state schools for the visually impaired and hearing impaired, respectively. Thus, we find a classic example of existing expertise located in the wrong place. Teachers at the state schools for the visually impaired and hearing impaired, who have the skills to teach high-functioning students, no longer work with them. Instead, they now teach low-functioning students for whom they lack the necessary skills and experience. And, from the state's perspective, local districts are lacking the expertise and experience to work with the high-functioning students for whom they are now responsible. The state office for Education of Children with Handicapping Conditions is aware of the problem and is developing a plan to prepare the teachers at the state schools to work with multiply handicapped visually and hearing impaired students, while at the same time, train teachers in the local districts to work with high-functioning sensorily impaired youngsters. It is projected that the SETRC network will play a major role in orchestrating the necessary training.

Personnel Configuration

The personnel comprising the ASA special education unit are: the Director of Special Education, the Master Teacher, 14 full- or part-time resource teachers, 27 full- and part-time self-contained classroom teachers, one itinerant teacher of the visually impaired, two school psychologists, 11 speech/language therapists, and 20 full- or part-time teacher aides.

The work of the unit is carried out primarily by five teams defined by the programs each team provides. The director heads the team of four teachers who work with emotionally disturbed students; while the Master Teacher, who works out of the ASA's central office in Brownsville, heads two teams: one comprised of 14 resource teachers, and the other of five teachers of trainable mentally retarded (TMR) and two teachers of severely-multiply handicapped (SMH) students. The two remaining teams are each comprised of eight teachers of educable mentally retarded (EMR) students. Each is headed by an ASA school psychologist.

Each team meets two to four times a month to plan activities and once a month with all other teams to discuss on-going curriculum projects, diagnostic practices, and long- and short-term problems encountered in delivering services. Team leaders meet once a week with the Special Education Director. It appears that the process of regular get-togethers overshadows any specific outcome of team meetings. Organizationally the teams are informal and no activities are actually required from an organizational point of view. The teams are the Director's brain child; they are designed to facilitate communication and indirectly boost quality rather than to pursue formal organizational goals. From the standpoint of continuity of curricula and the facilitation of on-going communications, most teachers believe the team concept works well.

Master Teacher

Among the responsibilities of the Master Teacher are the following:

a. bi-weekly visits to each classroom;

b. training of teacher aides;

c. curriculum development;

d. professional development of ASA teachers, including the diagnostic observation of the teachers and on-site training involving consultation and modeling;

e. substitute teaching.

While she is not an evaluator, the Master Teacher does help teachers improve on their techniques and, thus, serves as a valuable resource. As she makes her rounds, the Master Teacher will note through structured observations any weaknesses particular teachers may demonstrate. In many cases, simple verbal prompts on her part ameliorate the problem. Sometimes, she models the appropriate teaching techniques. In other instances she will arrange to substitute for a day so the classroom teacher can observe another teacher, although logistical and distance factors sometimes get in the way. Most of the teachers agree that when they ask for help this method of skill refinement has been advantageous to them. The Master Teacher is well liked and her personality as well as her knowledge serve to make this arrangement effective.

By the time the Director conducts the formal evaluation of a teacher, these "front-end" procedures should have taken place. The Director holds the Master Teacher responsible, whether he observes exemplary or deficit teaching. If the Master Teacher is unsuccessful in improving a teacher's skills, the Director then consults with the teacher in an effort to improve his or her performance.

Other ASA Services

We've mentioned that, organizationally, the ASA comprises three service areas: special education, occupational education and the CRSE (educational communications). Following is a description of the occupational education and rural supplementary education services insofar as they impinge on special education.

Occupational Education

There are two locally-supported occupational education centers in the Foothills Service area, one in Hendrixson, the other in Whitman; both serve handicapped students. Pre-vocational and vocational preparation are offered in the following areas: (a) agricultural mechanics, (b) automobile mechanics, (c) building construction, (d) conservation, (e) food services, (f) health services, and (g) office occupations. The major program goal is employability for students--nonhandicapped and handicapped alike.

In the vernacular of the occupational education program, handicapped students are referred to as students with "special needs." High functioning special needs students (secondary EMR students) are placed in one of two program options: the Diversified Occupational Program or the Multi-Occupational Program. The latter stresses a "mainstreaming" approach in which about 15-20 percent of these high functioning special needs students in occupational education programs are fully integrated into the regular occupational programs listed above. The former is more restrictive, yet also involves some integration. In this Diversified Occupational Program, the remaining 80-85 percent of the handicapped students are exposed to as many of the occupational programs as is logistically feasible. While the Diversified Occupational Program stresses exposure to a variety of work settings, the Multi-Occupational Program provides handicapped students with more intense regular occupational training.

Lower functioning (TMR) students are provided services that involve a collaborative arrangement between the ASA's occupational and special education areas. Essentially, ASA special education teachers at the Whitman Occupational Education Center work with moderately handicapped students in pre-sheltered workshops preparing students for later sheltered workshop placement. Although many of the work activities are, as one teacher put it, "busy work," the teachers are able to arrange some piece work for pay. Either way, the major programmatic emphases are work habits and social skills.

Rural Supplementary Education

In 1968, the ASA was funded under Title III of the Elementary and Secondary Education Act to create the Center for Rural Supplementary Education (CRSE) through which usage of educational media was to be developed and stimulated. Special education came to the forefront in the early '70s relative to ASA priorities. However, community priorities continue to hold occupational education in first place. Thus, the CRSE ranks third among the three program thrusts of the ASA. This fact, however, does not negate the importance nor the excitement that are imputed to current CRSE activities.

The CRSE conducts a number of service delivery activities under the auspices of the ASA, in addition to its historic mission, i.e., films and film services. In the last decade CRSE has developed services involving educational communications. Educational TV programs are distributed via closed circuit to participating LEAs. Through open channels, educational television serves 14 communities. Of late, the CRSE has begun applications of microcomputer technology to educational service delivery.

Educational films/film services. The ASA through its CRSE collaborates with nine other ASAs in the northwestern tier of the state to maintain a film library. This collaborative arrangement provides access for the ASA's 20 component districts to over 1600 films, many more than any one ASA could provide alone. Upon request, the CRSE's van delivers and retrieves films and other media from the schools each day.

Educational communications. The backbone of the educational TV services offered by the Foothills ASA is the TV translator system and its towers (no fewer than 19) that serve 14 communities as well as transmit programs to local school districts. This translator system is technology's answer to one of rural America's frequently cited barriers: terrain. The translator redirects the typical straightline TV signal so that it literally can climb and descend the mountains. In addition, certain ASA-based programs are fed to the local districts. These include:

"Brain Games," a quiz program similar to the General Electric College Bowl in which local students represent their schools in competition with one another; "What's Up Doc?", an ASA editorial program in which the ASA director (who has a Ph.D. and hence qualifies as "Doc") gives periodic updates about the ASA, its programs, and its current activities; and "Mountain Update," a news program anchored and reported by local students. The "What's Up Doc?" program probably is as useful to the ASA Director as much as any other mode in communicating with local agencies. And while superintendents in the past haven't exactly curled up in front of the fire to watch "What's Up Doc?", they have begun watching it after hearing about the other two shows from students in unpredictable ways such as in hallway conversations, and the like. One of the by-products of these other two shows is the identity they foster for the LEAs whose students participate.

Microcomputer applications. ASA personnel are just beginning to develop instructional applications of the burgeoning microcomputer industry. Administratively, this ASA has already incorporated these computers into the paperwork management system. However, with respect to instructional applications, hardware capacity and availability seem to have outrun the necessary software.

Identification and Processing of Handicapped Students

The process of identifying and processing students believed to be handicapped, or who qualify as such, is engineered by a standing Committee on the Handicapped (COH), one of which exists in each of the 21 LEAs. It's composition is standard: principal (assistant superintendent), psychologist, guidance counselor, referring teacher, special education teacher, parent, and physician. Typically, an actual meeting does not include all of these individuals. The COH finds it easier to involve parents of elementary students than parents of secondary students. Overall, about half of the parents attend the Phase I and Phase II components of the process. Each LEA, however, appoints as a standing member a parent who will represent the interests of the particular handicapped student and his/her parents. Thus, the representation of a parental perspective is ensured indirectly. If requested, the school nurse serves in lieu of the physician. In certain cases, and given 72 hours' prior notice, an LEA can arrange for a physician to attend. But in the main, his/her presence on the docket is one of paper-compliance rather than actual attendance.

Typically the guidance counselor, psychologist, or resource room teacher serves as the chairperson of the COH.

Regulation 77 requires that the development of the Individualized Educational Program (IEP) be carried out in two phases, the first of which places the COH chairperson in the leadership role. In Phase I, the COH determines (a) the need for special education, (b) the most appropriate special education program, and (c) the personnel and/or agency(ies) responsible. For example, upon the COH's determination of the existence of a handicapping condition, its Phase I staffing sets forth the learning needs of the student and recommends placement in one of the program options: learning strategies resource room, or one of the four self-contained classroom arrangements.

Although it may be clear on the basis of intelligence testing and adaptive behavior data that a student has a high likelihood of being mildly retarded, the specification of programming (i.e., self-contained vs. resource classroom) ideally should be based on specific academic and social strengths and weaknesses and not the EMR label *per se*. Under the precursor law guidelines, Phase I staffing decisions were more cut and dried. For example, if a student exhibited school-related behaviors leading to the label: learning disabilities, s/he would be placed in a resource program. However, Regulation 77 requires the COH to consider four broad criteria relative to a subsequent program placement: (a) academic achievement, (b) social development, (c) physical development, and (d) behavior and physical management needs. Programming depends less on the diagnostic label than on the student's relative strengths and weaknesses across these criteria.

The IEP's development is then continued in Phase II and is the responsibility of the special education teacher. At this point, the special education teacher, the parent, and, if appropriate, the regular classroom teacher, develop short-term objectives, subordinate behavioral objectives, and day-to-day lesson plans based upon the educational needs and goals specified during Phase I. Schedules and procedures for short-term evaluation are specified. The IEP as a whole is reviewed annually and re-evaluations of the student by the local COH must be conducted every three years.

Following are summaries of the Regulation 77 referral and placement policies implemented locally. Also included are due process steps set forth in state policy for the protection of the handicapped student and his or her parents.

Referral and Admission of Pupils Into Special Education Programs

Referral of a student suspected of having a handicapping condition is initiated through a written referral, usually on the part of a regular classroom teacher, to the COH. No more than five days after the referral, the COH chairperson must notify the student's parent who then must give the COH written consent to conduct a pre-placement evaluation.

Pre-placement Evaluation. After consent has been given, the COH gathers existing physical and psychological information, a social case history, current immunization and medication records, and academic achievement information. Upon collection and review of these items, the COH determines if or what additional data are needed and whether the home LEA or the ASA could provide the appropriate program should such services be necessary. If further evaluation is needed, the COH again requests written consent from the parent.

Evaluation and Placement. Given that consent, the COH arranges for the necessary evaluations, and based on their results, determines provisionally whether or not a handicapping condition exists. If, in the opinion of the COH, a handicapping condition exists, the parent is sent a written invitation and contacted by phone by the COH chairperson to attend Phase I of the IEP process. Both parents are asked to meet with the COH to discuss the evaluation, long-term goals and objectives, and the program options. The COH then recommends the appropriate placement to the LEA School Board. At this juncture Phase I of the IEP has been completed. Its steps and those of Phase II are summarized below.

Development of the Individualized Education Program

The process of developing IEPs for handicapped students is sequenced according to the following steps:

a. Referral of a pupil thought to be educationally handicapped to the COH;

b. Evaluation of a pupil by the school psychologist to determine eligibility, classification, and educational needs;

c. Recommendation by the Committee on the Handicapped to the Board of Education for the provision of special education programs and services to the pupil (IEP-Phase I);

d. Arrangement for the pupil's entrance and continued assessment in the recommended educational settings;

e. A Planning Conference for the completion of the IEP (IEP-Phase II);

f. IEP Implementation and Annual Review.

Three stages in the sequence of events must be completed within 30 school days each:

a. The time period from the date a referral is received by the district to the COH's recommendation for the particular special education program may not exceed 30 school days.

b. The time period from the date of the COH's recommendations to the Board of Education to the date upon which special programs and services begin may not exceed 30 school days.

c. The time period from the date of the child's entry into special education to the completion of Phase II of the IEP in a planning conference may not exceed 30 school days.

Phase I of the IEP forms the basis for the COH's recommendation to the LEA Board for program placement for a student with a handicapping condition. Within 30 days after referral, the following components must be specified:

a. Present Levels of Educational Performance relative to:
    1. Achievement/Learning Rate.
    2. Social Development.

    3. Physical Development.
    4. Management Needs in the Classroom.

b. Diagnostic Classification (LD, EMR, etc).

c. Annual Goals.

d. Special Programs and Services: Extent of participation in regular and occupational education, where appropriate.

e. Special Class Size, if appropriate.

f. Specialized or Adapted Equipment.

g. Alternative Testing Techniques.

h. Projected date for initiation of services, amount of time per day and date for review of pupil's status.

During the next 30 days: (a) the Board of Education acts upon the recommendation of the COH, (b) Phase I of the IEP and other information relevant to program preparation for the child are transmitted to the designated special education teacher, (c) parental consent for the initial provision of special education is sought by the COH, and (d) the student enters the recommended program for continued assessment and evaluation pertinent to the development of Phase II of the IEP.

During the final 30 days: (a) the student has begun to receive the approved special education programs and services, (b) the personnel providing special education assess the specific instructional needs of the pupil in the class, (c) the planning conference is conducted to complete Phase II, and (d) the IEP, with Phase II completed, is forwarded to the COH.

Phase II of the IEP is developed at a planning conference conducted within 30 days of the time a student enters a special education program and is reviewed at least once a year thereafter. The Phase II written document is based upon the Phase I long-term goals and objectives and includes: (a) a statement regarding short-term instructional or behavioral objectives, consistent with annual goals, and (b) appropriate objective criteria, evaluation procedures and schedules for determining if objectives are being met. The teachers who provide the special education bear the responsibility for generating these objectives and criteria. In the case of occupational education services, the special education teachers at the two occupational education centers prepare Phase II of the IEP insofar as academic work is concerned.

The home LEA's COH must afford all parties the opportunity to participate in the planning conference. If the parent or other parties at the conference need an interpreter, the district must provide one. There is no requirement in statute or regulation for a parent's signature on the IEP document. This ASA, however, does require that parents sign a form documenting their participation at the Phase II planning conference. The conference may be conducted without the parent present; however, the parents must be notified five days in advance of their opportunity to attend the conference. If it is not possible for the parent(s) to attend, other alternatives such as individual or conference telephone discussions must be attempted.

Review

The annual review is a review of the status of each student identified as having a handicapping condition, conducted by the COH at least once each year for the purpose of recommending continuation, change, or termination of the existing program. The projected date of the review of the students need for services is designated in Phase I of the IEP. It is the date on which a COH plans to review the student's status, barring any unforeseen circumstances which might require a change in the date of review.

Parent Participation and Procedures Ensuring Their Right to Due Process

Because of the general history of the lack of parent participation in the referral, identification, and IEP development processes, the SEA established stringent parental participation requirements. Essentially, the COH is responsible for ensuring that the parent:

a. Is notified of the referral;

b. Is contacted in the event of questions or a need for more information;

c. Decides whether or not to give written consent for the preplacement evaluation if the child is being evaluated for the first time;

d. Decides whether or not to request the physician's attendance at the COH meeting at which the child is discussed; and that the request is made in accordance with district procedures;

e. Participates in the COH meeting by providing information about the child;

f. Is notified of the COH recommendation to the LEA Board of Education;

g. Reads the notice of the Committee's recommendation and contacts the COH for answers to questions or further information;

h. Is notified of the Board's approval of the COH recommendation;

i. Decides whether or not to give written consent so that the child can receive special education services;

j. Is notified of the Phase II planning conference which is held at a mutually agreeable date, time and place;

k. Participates in the IEP Phase II planning conference.

At the outset of the referral process, the parent must be notified in writing that evaluative information is being sought. This notice, as mentioned, must be sent within five days of the COH's receipt of a referral and must include:

a. A description of the proposed evaluation and the uses to be made of the information.

b. A request for parental consent for such evaluation.

c. A statement of the parents' right to request the presence of the school physician at the COH meeting at which their child will be discussed.

d. The date, time and location of the meeting at which the parent may participate in the development of IEP Phase I.

e. A statement of the right to be accompanied at the COH meeting by such individuals as the parent may desire including an attorney.

The parent must also be notified of the COH recommendation for special education program, placement and/or services. This notice must:

a. Describe the recommendation in detail.

b. Specify the test or reports upon which the recommendation is based.

c. State that the school files, records and reports pertaining to the pupil will be available to the parent for inspection and interpretation.

d. Describe in detail the right to obtain a hearing if there are objections to the recommendations.

e. Indicate that the parent or legal guardian shall be afforded an opportunity to obtain an independent evaluation and include names, addresses and telephone numbers of appropriate public and private agencies where such services may be obtained.

f. Indicate that the parent or guardian may be able to obtain free or low-cost legal or other relevant services, at no expense to the district, and include names, addresses and telephone numbers of such services.

g. Indicate that while any proceedings are pending, unless otherwise agreed upon, the pupil shall remain in the current placement.

h. Request parental consent to the provision of special programs and services for pupils entering special education for the first time.

The parents must also be notified prior to the Phase II-IEP planning conference and the annual review, and of the final LEA Board the COH recommendation.

Even with such an elaborate mechanism, about half of the handicapped students' parents invited to participate do not. According to one parent, the ASA, through the COH members employed by them (usually the psychologist and special education teacher), makes every effort to apprise parents that help for their children depends largely on their participation in the process. These efforts, including home visits, are laudable; but, in general, parents participate in programmatic matters at a less than desirable rate. Many factors influence the overall degree of parent participation. These include the particular phase of the IEP that is being developed. Usually there is more participation in Phase II. Also, the LEA itself is an influence since some have historically had better contact with parents than have others. In any event, the COH, like the IEP committees in other states, itself, can initiate procedural due process by requesting a hearing. According to one of the ASA's school psychologists and the Special Education Director, there have been three impartial hearings requested during their tenures with the agency; all have been initiated by parents.

Staffing of Handicapped Students in the Occupational Education Program

An "interface committee," comprised of the special and occupational education teachers, the principal of the particular occupational center, and a team leader, is formed for each special education student to facilitate his/her progress through the occupational program.

Staffing procedures related to pre-vocational and vocational education for handicapped students involve the coordinated work of the interface committee and the LEA-based COH. This is usually accomplished by a liaison person who smoothes the communication between the committees and amplifies the programmatic goals of the IEP within the vocational setting. Typically this liaison person is the team leader or the special education teacher at one of the two occupational centers.

The Context of Collaborative Relationships

In this state, 70 to 80 percent of the people live on 5 to 10 percent of the land area. The remaining 20 to 30 percent of the population is dispersed over the remaining 90 to 95 percent of the land. In the years preceding the development and inception of the ASA concept there were no comprehensive state-wide services. Educational service equity was evidently lacking. In those areas where particular effects of inequities were intolerable, school consolidations resulted.

Following the establishment of ASAs in 1948, local schools saw the possibility for an organizational solution to the demands for educational services that were equitably distributed. However, services particularly addressed to the handicapped were delayed for another 25 years. By the time the precursor to Regulation 77 was passed by the state legislature in 1974, non-metropolitan schools had responded sporadically and inconsistently to the needs of these children and youth. In areas where strong advocacy was present, responses were more frequent and substantive. During 1974, the state's precursor legislation took hold and local responses became more consistent--and more dependent on ASAs. The press for collaborative action grew.

There are of course a variety of incentives and disincentives for such cooperation. The major incentive is clearly fiscal. While some of the member LEAs in the Foothills ASA have moved to operate their own programs (usually with original stimulation and assistance from the ASA), most local superintendents are convinced that it is cheaper for the ASA to develop and maintain a program than for individual LEAs to do so (although they would probably argue that LEA-maintained programs would be as good). A further major incentive is the press coming from the SEA for collaboration, a force that can be easily channeled and focused because of the dual nature of the ASA Director/District Superintendent post. The SEA is charged to monitor the special education programs of the LEAs, and, given the organizational arrangement of coterminous ASAs and state supervisory districts, it seems clear that the LEA is more likely to be found in compliance if the ASA provides its students with special education services than if it provides those services itself. Thus, both fiscal and political incentives for collaboration are strong.

On the other hand, the LEA also has some good reasons for remaining outside the ASA structure. Chief among these is the fear of decreased local autonomy. History reveals a steady decline in local autonomy, as for example, because of the press for district consolidation. The ASA Director indicated that each of the area's towns has its own "ethnic flavor." He added that the need for identity coupled with the natural geographic barriers of the region have made past school consolidations untenable. When churches, post offices, and other foci for local identity close, what else is left but the schools? It is likely that some residents feel that as the school goes, so goes the community.

Another disincentive is the tendency for the local communities to see themselves as having been inequitably treated. They feel that the state's educational policies are unreasonable. The laws seem to demand equity in the services that must be provided, but are perfectly tolerant of the differences in local ability to pay for them. Does joining the ASA help to overcome this inequity? If not, why do it?

ASA special education teachers themselves can act as an incentive or a disincentive for collaboration. Whether they are liked and seen as effective by their regular colleagues are important factors in the acceptability of a collaborative arrangement that depends on them. ASA teachers who are effective, well-liked, and stable members of the community will be wanted by the local agency, but those who are seen as ineffective, or who are not well liked or not perceived as stable community residents, will not. They will be shut out of the building pecking order. The community will at best be tolerant, and at worst, rejecting of them. As such, ASA teachers can personify the intrusion of a meddling state department. Eventually these teachers will resign, move, or be released. In all events, ASA teachers can discourage or enhance collaboration. They are the ASA's most visible element.

These incentives and disincentives can interact in a synergistic way. The needs for autonomy in a given community help to mold local political issues and resulting school policies. These factors in turn interact with how ASA special educators are perceived and treated. And how special education teachers "read" and respond to the climate created by these other cultural and political issues in turn influences the intensity with which those issues are regarded. These are pervasive, continually changing, symbiotic influences on the nature of LEAs as collaborative partners--among themselves and with the ASA.

LEA/ASA Relationships

LEA/ASA relationships are characterized by endeavors involving occupational education, the CRSE, and special education, including its SETRC project. Because the ASA is competently orchestrated, these relationships tend to benefit special education by providing quality educational programming.

Occupational Education. The Whitman and Hendrixson Occupational Educational Centers serve as sites for the vocational preparation of students who intend to learn a skill or trade. Nearly 600 students, handicapped and non-handicapped, of the component LEAs were enrolled at the two occupational centers and received training during the 1981-82 school year.

CRSE. CRSE provides the LEAs with film and media services as well as TV programs. This relationship is well entrenched, is supported by adequate resources, and benefits from ASA collaboration with nine other ASAs in the region. CRSE also uses its television production capabilities to provide viewers in the area with information on programs and facilities for the handicapped, as well as a child-find mechanism, although the requirements for such efforts have been rescinded by the state.[1]

Special Education. The relationships between the ASA and the LEAs are not easily classified. Their nature seems to depend upon idiosyncratic historical and demographic features of the LEAs as much, if not more, than on more general factors. Several examples will illustrate the point.

North Snowcourt and the Foothills ASA, 16 miles apart on the map, have collaborated closely to increase that LEA's feeling of involvement with the ASA's Learning Strategies Resource Room and the Individually

---

[1] This does not imply that no active child-find activities occur. The school nurse, in his/her role in screening, can refer school-aged children to the COH.

Paced Basic Adademic Program operated there. The North Snowcourt Superintendent feels that the programs operated in his LEA by the ASA owe their high quality to the nature of this collaboration, which is close and supportive. Yet, despite this close relationship, North Snowcourt provides none of its own special education services, electing instead to provide them through the ASA.

The situation in Brownsville, within whose limits the ASA is itself located, is different. Here, ownership of the programs has changed hands several times depending on prevailing economics. The Brownsville Superintendent wants to run his own resource room when there is a high enough prevalence of mildly handicapped students to make local operation economically feasible. When this prevalence decreases, he must draw in students from other LEAs in order to maintain the program. Since the ASA can serve as broker for transportation among several LEAs and provide materials and supplies, it's more prudent to have them provide the program.

In Georgetown, 8 miles east of Brownsville, yet another situation obtains. The LEA has decided not to take over the resource room even if it were to be financially advantaged to do so. Anticipating program reductions, Georgetown feels that if economic conditions force them to cut back (a contingency they view as likely), the resource room teacher is the ASA's responsibility, not Georgetown's. Since ASA teachers enjoy tenure provisions but Georgetown teachers do not, Georgetown believes it is safer to allow the ASA to run the classroom.

Thus we see that a variety of very idiosyncratic factors influence the local decision about whether and how to cooperate with the ASA for special education services. Some wish to enhance their local feelings of pride, autonomy, and ownership; some see ASA as a means to balance fiscal contingencies; some see it as a personnel protection mechanism.

SETRC. Perhaps the most effective collaborative mechanism is the SETRC project. While SETRC training workshops deliver content concerning special education topics, its target audiences are general as well as special educators, parents as well as professionals, and board members as well as administrators. In addition, a library is available to all educator or community residents so long as they have an interest in, or work with handicapped students. CRSE provides delivery and retrieval of SETRC materials. The SETRC training specialist provides regular educators in LEAs with consultation services regarding the mainstreaming of handicapped students. Finally, all LEAs receive a bi-monthly newsletter designed to inform teachers and administrators about the "latest" in the way of state-level policy and changes in that policy.

SOME ISSUES OF PARTICULAR CONCERN TO THE ASA

Issues that are problematic to those directly or indirectly involved with the Foothills ASA are the topic of this section. The major dimensions of these issues should already be apparent to the reader. Nevertheless, for the sake of clarity and ready reference, they are drawn together and discussed in an order not necessarily reflective of their importance or priority to the Foothills stakeholders. In fact, it is doubtful if a single priority listing (or even highly correlated multiple listings) could be agreed upon. Instead, the order in which the issues below are addressed reflects, in the judgment of the research team, the degree to which the rural nature of the Foothills area impacts the issue. Thus, the first issues are likely common to any cooperative agency, while those toward the end of the section are more related to the rural status of the Foothills ASA.

Stigma

It is not altogether unreasonable to assume that a handicapped student, once formally identified, becomes victimized by the pejorative nature of the label itself. There is evidence to indicate that the label leads to inappropriate inferences on the part of many individuals about the student and about his or her academic and social capabilities. Without proper knowledge, these inferences translate into negative expectations concerning what the student can or cannot do--physically, mentally, and emotionally. In fact, it is the opinion of some that these expectations easily can become self-fulfilling when individuals who hold them come in contact with the handicapped student. This is stigma; stigma not only associated with the behavioral manifestations of a handicapping condition, but also with a label itself, regardless of its behavioral manifestations.

In the Foothills area, patterns of stigma are little different from those observed anywhere. The more visible or severe the handicap, the higher the likelihood of stigmatizing effects. Moreover, the less any handicapping condition is understood, the higher the probability of a stigmatizing effect.

The Foothills ASA teachers have developed strategies, albeit on a piecemeal basis, to combat the deleterious effects of stigma on the attitudes of regular classroom teachers and nonhandicapped students toward handicapped students. For example, one ASA junior-high level IP-BAP teacher has devised a means for gradually integrating his EMR students (who are officially self-contained) into regular junior-high classes that might be termed "gradualism." For those whose needs can be met through regular class placement, he begins the process by presenting a lesson to the regular class--students and teacher--entitled "Understanding Yourself, Others, and Those Who are Different." The presentation is a timely mixture of a lecture and a film. He attempts to increase the levels of knowledge and awareness of the students and the teachers. He assures them both of his availability. As he put it, it's a lot of "public relations."

Furthermore, he follows up. During the initial stages of his student's placement in the regular class, he is in the class with the student. Gradually, he phases out his presence, yet he maintains his availability to the teacher and his or her pupils religiously. In some cases, he continues to maintain his presence in the classroom. He serves in the role of aide in the art class, for example, just to provide a link between his own classroom and the art class for three of his mainstreamed students.

Carlton provides us with another example of local innovation that results in a lessening of stigma. This second largest LEA in the catchment area created its own "ungraded primary" (UP) program, which prepares students for the regular primary grade appropriate for their age. It is a transition program that serves as a buffer for low achievers who may not ordinarily succeed in a regular class and who would probably be identified as EMR and served in an IP-BAP classroom. The ASA neither encourages nor discourages the program, according to one LEA administrator. The ASA exists to provide services to many of these children and, according to this official, probably would rather the LEA let the students be served by the ASA. "If we didn't have ungraded classes, we'd have to send some of these students to the ASA's EMR program." The ownership issue notwithstanding, the Carlton UP program in many cases avoids the placement of students in a classroom for the handicapped. While such a circumvention of the identification/placement process might be illegal, the UP program is certainly consistent with the least restrictive environment principle in that students avoid the stigmatizing effects of a label, segregation for at least 60 percent of the day, and the artificial differentiation for the purpose of quality service delivery that many believe they receive anyway in the UP program.

In general, the Foothills ASA is not without its share of the phenomenon called stigma. While it is apparent that the state's push to "delabel" special education is predicated, in part, on reducing stigma, we don't see Regulation 77 having much positive impact in this regard, especially when handicapped students are still labeled for diagnostic purposes. Reducing the stigma of labeling appears to depend on reaching people more than enacting laws. Teachers who are creative and resourceful enough to take a leadership role in helping all teachers --and all citizens--to increase their knowledge about handicapping conditions and about the people who exhibit them appear to be the key.

With its many correlates, stigma presents pervasive problems to all those concerned with handicapped students, problems which the Foothills staff must face. Their solution depends on the interpersonal qualities of the ASA special education teacher, the attitudes of regular education personnel toward special education, and the nature and quality of ongoing communication between regular and special educators.

Interpersonal Qualities of the Special Education Teacher

For many years, researchers and practitioners have asked the question: What makes a good special education teacher? Most have used atomistic approaches in attempting to find an answer. Competency lists have been generated and functional analyses of in situ teacher behavior have been reported; such lists and analyses usually stress the interpersonal skills the teacher needs to possess. What is missing in many such studies, however, is a priority ranking of competencies, and, especially, the import of these interpersonal qualities with respect to effective teaching.

It is apparent that under Regulation 77 and P.L. 94-142, teachers in the LSRR and IP-BAP programs need to communicate effectively with their colleagues in general education. These communication skills are necessary from two standpoints: the welfare of the mainstreamed students, and the professional welfare of the special education teachers themselves.

From a nationwide perspective, the state-of-the-art resource room model achieves somewhat less than satisfactory instruction in the regular classroom from at least an academic, if not a social, perspective. Regular classroom teachers of mainstreamed handicapped students simply do not perceive themselves as skilled enough to meet the day-to-day instructional and management demands that are placed upon them. In such cases, it is crucial for the ASA special education teachers not only to establish and maintain perfunctory communications in regard to scheduling and curricular logistics, but also to sympathize, to cajole, and basically, to act as an instructional resource in the true sense. The bottom line indeed appears to be that a close relationship is the best facilitator of communication.

Yet that requirement does not call simply for friendship. Friendship is not always possible, and in certain instances, it is not even desirable. Some educators believe it best to avoid developing personal relationships in the professional setting. Short of such relationships, there are other work-ethic strategies that suffice and, in the process, benefit the handicapped student. One of the ASA's IP-BAP teachers succinctly summarized these as: (a) "I make myself available," and (b) I "go the extra mile." Expanded, these slogans mean that the teacher needs to be on call during the day and, yes, even in the evening. S/he needs to frequent the teacher's lounge and banter about, as it were. S/he needs to visit classrooms in which handicapped students are mainstreamed. Unfortunately, anything short of this level of effort sets the stage for problems. One teacher indicated that there is a tendency to get "bogged down." According to this teacher, his/her communication with regular educators suffers because the caseload prevents needed, on-going consultation, even though an aid is present in the class for at least a half day.

The special education teacher's professional welfare is also at stake. It is relatively common to find a two-master situation among special education teachers working in a cooperative agency. Although the ASA teachers generally encounter no problems in answering to both the ASA Director of Special Education and their respective building principals, a few suffer from less than total support from their local administrators. One teacher stated that the presence of ASA-operated classrooms in some cases leads local administrators to repudiate responsibility for the program, even if the classes are located in their own buildings. In other words, an administrator might feel that the students are ASA students and not his or her own. Thus, the two-master syndrome is not so much a matter of inconsistency in administration as it is a failure to exercise leadership.

Given the latter circumstance, the ASA teacher who, on a personal level, does not harmonize with LEA staff is in danger of undermining his or her own professional welfare. One who feels isolated and alienated in relation to the local school and its community certainly works under less than desirable circumstances. Whether or not this teacher resides in the community and participates in community functions and extracurricular school activities could have a bearing on his or her acceptance. All of these considerations tend toward one pivotal implication: the interpersonal qualities of special education teachers play a crucial role in the success not only of handicapped students, but also of the teachers themselves.

Attitudes Toward Special Education and Handicapped Students

The attitudes that are held toward special education and toward handicapped youngsters as individuals are heavily determinative of the potential for success of programs such as those operated by the ASA. Three levels of attitude impinge: the community in general, regular teachers, and nonhandicapped students.

The Community

The community provides the broad attitudinal context within which other attitudes must be formed--the attitudinal matrix, as it were. And in the Foothills area, community attitudes seem to turn largely on the matter of money. Although there is general acceptance of the need for special education and of the handicapped students themselves, the chink in the armor of this acceptance is program costs. As one parent of a handicapped student said, "the feeling is that $10,000 is better spent on 10 kids than on one." Although the backlash that can result from the disproportionate costs of special education is not yet evident in the Foothills communities, a state department official asserted that as money tightens, the attitudes in these communities will become more conservative with respect to how local funds are allocated to special education.

Regular Classroom Teachers

The attitudes of regular classroom teachers seem to turn on three factors: the extent to which they feel knowledgeable about the problems of the handicapped (and therefore, the extent to which they feel competent to deal with them), the extent to which they feel at least partly responsible in the education of the handicapped, and perceived differences in their own working conditions as contrasted with those of special education teachers.

Some regular classroom teachers have virtually no knowledge about handicapped youngsters and hence can only regard the special teachers with a kind of awe. "Gee, I don't know how you do it," or, "I wouldn't do it for a million dollars," are representative of the kinds of comments one hears from them. Accompanying these perceptions of special teachers are self-perceptions of incompetence with respect to teaching handicapped students; these regular teachers see themselves as insufficiently skilled in instructional methods thought to be special. They are therefore quick to divide the students into "mine" and "yours" categories; they have little interest and see little possibility in bridging the gap. This posture can especially be exacerbated if the mainstreamed student is from another LEA. Fortunately, such teachers constitute a distinct minority.

The Foothills area is blessed with many other teachers who, perhaps because of greater experience with or knowledge of the handicapped, tend to be more accepting and indeed, to feel at least partly responsible for their education. But there is more than greater knowledge here; these teachers also demonstrate a sense of commitment. Instead of saying, "I wouldn't do it for a million dollars," they are more likely to assert, "I'll do it because it's my job." Most of the area teachers are of this persuasion; when they do refer a student for special services it is in response to a genuine perceived need and not just a matter of "passing the buck."

A third factor, unrelated to either knowledge or commitment, that influences the attitudes of regular teachers has to do with differences in the ways in which ASA special education teachers' and LEA regular education teachers' contracts are negotiated. Each group is represented by a separate bargaining group and as a result, their contracts differ in terms of salaries, benefits, and, more importantly, underlying philosophy. One issue lurking within the operational philosophy of the organization representing the regular classroom teachers is the perceived negative influence mainstreamed students have on the teachers' working conditions. No formal proposals have been made to date, but teachers, both regular and special, who are concerned with this issue wonder how it will be handled, when and if it emerges.

Nonhandicapped Students

The attitudes which nonhandicapped students hold toward the handicapped seem to hinge upon two factors: their own degree of knowledge about handicapping conditions, and the procedural flexibility exhibited by the school in dealing with the handicapped.

With respect to the first factor, it seems clear that small schools such as those found in the rural setting have a real advantage over their larger counterparts in the cities and suburbs. The closer personal relationships, friendship and kinship patterns that are bounded but also intensified by small community size, and early and continuing exposure to the handicapped in a wide variety of circumstances all make it quite likely that knowledge, and hence understanding, will be high.

With regard to the second factor, the low level of procedural entrenchment found in smaller schools is also supportive of positive attitudes. Carlton provides an illustration of how procedural flexibility can enhance acceptance. Prior to the arrival of the current elementary principal, all of Carlton's ungraded primary (UP) programs were located in the kindergarten wing of the school (then known as the "dummy wing"). Consistent with the tenets of the UP program, the new principal integrated the graded classrooms throughout the building and designated them as ungraded. As a result, the stigmatic attitudes of the regular classroom students dissipated.

The importance of the small school setting is evident in virtually all of the Foothills LEAs; after all, in 17 of the 21 LEAs, students have grown up with their handicapped classmates and have seen them on a virtually daily basis since first entering school. In addition, intensive doses of information about handicaps through strategies such as the presentation, "Understanding Yourself, Others, and Those Who Are Different," developed by the IP-BAP teacher in North Snowcourt, act to increase the degree of acceptance that nonhandicapped students exhibit.

The Foothills area is surely not without its share of issues relating to community, teacher, and student attitudes about handicapped youngsters. Factors of program cost, ownership, size, and procedural entrenchment and flexibility, all interact to affect these attitudes, both in national and in local contexts. But it is probably the case that perhaps the pivotal influence shaping attitudes is the knowledge factor; the more experience, familiarity, and information one has about the handicapped and about handicapping conditions, the more positive the attitude is likely to be.

Parental Participation

As described in the section on Service Delivery, the state has mandated an extended series of points during the referral, placement, and IEP processes at which parental participation is required. In addition, a parent, who can represent the interests of handicapped students' parent, is required by the state to be appointed as a permanent member of each LEA's Committee on the Handicapped (COH). Given all of these regulatory assurances, the issue remains: in any given LEA, about half of the handicapped students referred, placed, and staffed, will not be represented on the COH by their own parent(s).

Two problems emerge. First, how can parents be convinced to participate? Second, how well are their interests represented by the parent representative? Regarding the first problem, no logical, generalizable solution seems apparent. Some parents can't participate. They work; they believe educators know what's best; they do not understand the process; they are fearful; or, they can't participate because of some combination of two or more of these reasons. A smaller percentage won't participate. Some of these parents feel they and not the schools know what's best for the child; thus, they neither trust nor participate in the process. Others are sensitive to the stigma associated with the handicapped label--indeed, the stigma may be so pervasive that it permeates their own feelings of self-worth. Sadly, a small percentage of parents who won't participate believe that no response to the school's attempts to contact them means that they've expressed their disapproval to the COH by not showing up. Even such strategies as home visits intended to entice participation don't seem to work.

Those parents who do participate see the world of educating their handicapped children quite differently. Their concerns are predictable. They want to be better educated about their rights as well as about their children's handicaps. They want to be active partners with the school's service personnel. They want to share their ideas with the teachers. The feeling on the part of teachers and administrators that some parents are neither receptive nor sophisticated enough to understand the services that are available and why they are available only undermines the participation process with these more responsive parents.

The issue of how well parental interests are represented by the parent surrogate member of the COH can be dealt with at two levels. First, LEAs in this area find it generally difficult to get a parent to serve; surely even not entirely adequate representation is better than no representation. Second, there is the question of who is qualified to represent other parents. We suggest, as one parent told us, that those parents who have "gone through the mill" are better surrogates than those who have no handicapped children. This parent went on to say that in advocating for services for a child, one must really defend the mandate as much or more than the child.

This is a critical point. Those who support the staffing and service processes appear to be more likely candidates for a surrogate role on the COH. Those unfamiliar with the process or unconvinced of its potential, probably do not fulfill the intent of this regulatory requirement. Similarly, parents who are aware of the process and have been down this road before tend to protect the rights of handicapped students and their parents with more tenacity. Finding such individuals, however, will continue to be a problem.

Changes in State Programmatic and Fiscal Policies: A Search for Balance and Equity

State policies with respect to special education seem to undergo endless change. The evolution of Regulation 77 has many mile markers: the original 1974 law, as well as several amendments refining it to its present form nine years later. Several reasons are cited for this ceaseless alteration. The first is turnover at the state department. Evidently, SEA staff make pitstops at the state capitol on their way to other jobs. Second, the SEA's official in charge of Regulation 77 is a lawyer rather than an educator. Whatever the reasons, the effect on the local schools and on the ASA are traumatic: no sooner are rules and regulations understood and implemented, than newer rules and regulations are passed down. The nature and adequacy of local compliance has to be affected by so many changes so quickly.

There is, however, another side to the story. It is reasonable to assume that: (a) the intent of the state's regulatory requirements, no matter how many times they change, is to provide an appropriate education to its handicapped students indeed, changes are intended to be improvements; (b) the ASA and LEA administrators agree with this intent, and (c) the most appropriate "punching bag" on which to ventilate frustrations related to these changes does not hang in Brownsville, Georgetown, or Carlton, but at the Capitol. When in doubt, blame the state department.

Thus, search for balance between stability and improvement will continue. There is no reason to believe that at some point adequate regulatory requirements that satisfy all concerned parties will not be in place. The real question of balance, however, is not programmatic but fiscal.

Although the state maintains that a primary reason for the implementation of non-categorical programs was to balance rural problems of distance and sparsity by allowing districts to combine categorical handicapping conditions, such a strategy did little to overcome fiscal inequities between rural districts and their urban and suburban counterparts. In the Foothills area land value is assessed unrealistically high. State assessors who receive one week of training at the Capitol are sent to the Foothills and other rural areas armed with official assessment methods that cause the area to be characterized as land rich and dollar poor. High taxes are levied even though many residents are incapable of paying them. Furthermore, this unrealistically high land value coupled with sparse population density lead to smaller state-aid ratios when compared to those of poor urban areas. Additional salt is sprinkled on the wound of inequity when rural districts are compared to suburban districts who are land rich and dollar rich.

While a balance in regard to programmatic equity may be on the horizon via Regulation 77, the search for balance in fiscal equity goes on. Perhaps one state department official summed up the gravity of the issue best. He indicated that since fiscal policy will never be "quasi-socialistic" (i.e., taking dollars away from rich LEAs and giving them to poor LEAs), no matter what the reimbursement system, it will be an "inequitable system."

Service Delivery

Our coverage of this ASA and its component LEAs has included a fairly thorough description of its service delivery. At issue is not the overall quality of these services; indeed they are innovative, and in many ways exemplary. Yet they are not without gaps.

Children Needing Related Services

Conspicuous in their absence are related service personnel to assist in educational programming and treatment for moderately and severely handicapped students. Given the high quantity and quality of direct and instructional support personnel, one would expect the ASA staff to include at least a physical therapist (PT) or occupational therapist (OT). Although a few LEAs provide PT services on an independent contract basis, the issue of whether PT or OT services meet educational needs continues to crop up. Thus, the COH faces the problem of deciding for what its LEA is and is not responsible.

Unfortunately, the state has its own somewhat unique way of defining support personnel. For example, the itinerant teacher of the visually impaired is considered by the state to be a support person, although he clearly provides direct services to visually impaired students. Similarly, the cadre of eleven speech/language therapists, also support personnel in the eyes of the state, comprise a major support staff. Thus, it is difficult for the ASA to convince the state of the need for an additional person, especially if s/he is to serve handicapped populations with low prevalence in the area.

LEAs willing to share in the services of an OT or PT find it difficult to justify buying such services for the same reasons. Therefore, the ASA must arrange for these services on a catch-as-catch-can basis. The Director of Special Education contracts with the hospital in Carlton for a physical therapist--again when it is necessary for these services to be provided.

Children Under Five

The state legislature has for many years considered but not consummated a mandate for preschool programs for handicapped children. Since the state mandates no preschool services, school districts do not have to provide those services for young handicapped students. Other agencies fill the preschool gap to some extent. The Early Childhood Direction Center, is run by the state's Bureau of Program Development (the same agency that operates SETRC). However, these centers provide parents with "direction" only, not direct services. Typically, they refer parents to Head Start centers or to preschool programs, such as Tekawitha's "Sunshine Project."

Head Start serves a large number of children under five. The "Sunshine Project" also serves this population. Head Start, of course, focuses its services on children from disadvantaged homes, while the "Sunshine Project", funded through federal grants and the county Family Court, concentrates its efforts on preschool children with physical disabilities. Both provide high-risk preschoolers with stimulatory and readiness experiences; and upon reaching school age, these children are handed over to the ASA. The ASA, parents of preschoolers, and advocates, await the time when the state will come to grips with the preschool issue and mandate such programs.

High-Risk and Unserved Children

Until 1979, the state funded local child-find programs. However, the state concluded the funding because it was convinced that high-risk children had been identified and that locally-based screening mechanisms were in place. In the Foothills ASA, these mechanisms include standard screening of kindergarten children and referrals by school personnel if necessary. Also, the educational TV branch of the CRSE continues to broadcast spots alerting citizens of the programs and services available.

With the recision of state funds it is reasonable to assume that these find programs are not as relentlessly pursued as they should be given the priority inherent in both Regulation 77 and P.L. 94-142. That is, both mandates call for schools to give first priority the provision of services to previously unserved handicapped children and youth.

Gifted Students

According to one of the ASA school psychologists, there are only a few programs in the Foothills area for gifted students. While Tekawitha has had a gifted program for three years, it was only this year that programs in Tilbury, Middleton, North Snowcourt, and Lafayette began. The sparsity of gifted programs is traceable to the state's reimbursement priorities. One superintendent told us that the state aid for gifted students is three dollars per pupil. Until state aid for this program begins to approximate that of programs for the handicapped, it is doubtful that very many small schools will be able to afford those services--alone or through an ASA.

Children Who Fall Between the Cracks

It appears that in LEAs that neither operate their own LD and EMR programs nor share ASA services, students who would ordinarily receive these services instead are provided "compensatory education services." In such cases, they are in part-time remedial reading and/or mathematics programs that the LEAs fund through either Title I or PSEN monies. The questions of the legality or ethics of this practice aside, one wonders about the effects of using these funds on students who actually need special education instead of on the students who, because of low income and low achievement, should be receiving these Title I and/or PSEN intents. Many of the other LEAs offer neither of these services. It appears that there are quite a few students who fall through the cracks between regular and compensatory education, on the one hand, and between compensatory and special education on the other.

Handicapped Children Transported to Other LEAs

In this ASA as well as in many other rural agencies, the amount of time during which a student receives instruction and the time it takes to transport him or her to the instructional site become related issues. In this state the SEA mandate on minimum time in class requires handicapped students to receive at least five hours of instructional time per day. One superintendent indicated that the state "[comes] down hard" with respect to this requirement.

Logistical problems are created for local agencies which according to state policy are responsible for transporting students. An LEA must arrange for transportation with other local agencies. Sparsity dictates the routes travelled and the distances covered. One LEA official told of a student who is bussed 27 miles to school. Some students must transfer to another bus enroute. Two-hour per day stints on the bus can result.

Scheduling for small numbers scattered "here and there" provide administrators with regular headaches. Transportation problems can even affect family functioning as the logistics of getting a handicapped child ready for school early in the morning can provide a family its share of tensions. The SEA however remains effective in enforcing the minimal class-time rule despite the transportation and sparsity constraints. Students being bussed nevertheless meet the state minimum for class time. The rare exception might be a few students who occasionally are 10 to 15 minutes short because of mechanical problems with the bus, the weather, or both.

Staff Retention

Retaining qualified pupil personnel is an issue encountered in many rural agencies. In most rural areas, we'd add the problem of recruitment to that of retention. Yet in the Brownsville area, the population is neither so unstable nor so sparse that recruitment becomes a concern. Nor is retention a major problem; yet when it does emerge, its characteristics are similar to those found in many rural areas.

Without many exceptions, people who live and teach or administer here are those who like the "pace of life," the "good people," and the outdoor sports and activities. Family life also makes for a compelling reason to stay. Those who can't make it leave because the pay is low, or the pay is different[1] from LEA-based regular or special education teachers.

ASA teachers, because of their certification, are able to seek and likely to find jobs in areas more culturally charged. The ASA loses 20 percent of its teachers annually. Some of them have had distinct problems functioning in the classic two-boss, visitor's-territory setting akin to many rural areas. One ASA official indicated that ASA teachers have an image problem: their fringe benefits, staffing arrangements, and pay all differ from their LEA colleagues. Sometimes, they even fall prey to the "special ed" stigma within which their students are enveloped.

The ASA's main strategy for keeping qualified teachers is the support network which emerged as a by-product of the Director's Team concept. The Director conducts stress-reduction workshops. The Master Teacher visits all the teachers as often as logistically feasible. Most of all, by meeting as teams, some of the teachers develop friendships and a feeling of belonging which, in the final analysis, serves best to offset feelings of alienation and isolation.

Local Autonomy

LEAs usually want to retain their programmatic autonomy even though, because of population sparsity and poor local economies, locally-owned programs may not be fiscally viable. Earlier years saw frequent school consolidations. Continuing pressure from the SEA and the ASA in this direction has resulted in significant determination on the part of local agencies to remain as independent from state and regional control as an LEA within a supervisory district can in this state.

---

[1] As has been mentioned, ASA teachers are paid according to an agreement negotiated by their own (ASA) teachers' organization. These negotiations and resultant agreements are distinct from, and in many cases different from, those of LEA teachers.

Local control of the schools has been a tenet of American life since the days before mandated public education. Especially in towns whose people identify on the basis of ethnicity, heritage, and/or cultural mores, the freedom to conduct town business according to the needs and desires of its residents--not the county, not the state--is treasured. One by one, personifications of town identity become consolidated: postoffices, stores, churches, banks; the school becomes not unlike the last man to cross the line in a tug of war. So, the point is made again: as the school goes, so goes the community.

From the perspective of the ASA Director/District Superintendent, any interaction with component districts has to be conducted with the need for local autonomy balanced against the need for continuity in curriculum and programming across the ASAs.

The four-way split of one of the LEAs three years ago provides a bleak illustration of the necessity for this kind of balance. Requiring "a few thousand hours of my life," the ASA Director adroitly mediated this division which centered on the issues of high taxes (the split reduced residents' taxes by 50 percent) and local autonomy. The enrollment of the former district had declined so much that the LEA was unable to provide all of the necessary services. The high taxes and local control of the school were community issues. The quality of services was an ASA issue. The decline in enrollment (a total of 192 during a ten-year period) and the employment of the LEA's teachers were issues to both. The Director laid out the alternatives for consolidating each of the four parts of the district with other LEAs. He did so in the midst of a conflict so intense that, during a ten-year span, there were 100 different members of the local board. In the process of splitting this district, he also arranged for all but four of the original LEA's teachers to be hired by the LEAs that absorbed this district. One of the current component districts recently indicated a desire to split apart. The Director must wonder whether the issue of local autonomy, in part, will cost him another thousand hours.

The Big Four: Interactions of Off-Cited Barriers to Quality Services in Rural Areas

The last of the issues should come as no surprise to the reader. In many ways the ASA is helpless to deal with these barriers, yet they represent an issue closest to their hearts. The "big four" are sparsity, terrain, climate, and distance. Alone, each could be circumvented and, indeed, some literally are. Together, however, they permeate all services, all activities, and the lives of all personnel associated with the ASA.

Sparsity

Sparsity as an influence on the ways state policies are implemented in rural areas is a paramount consideration. The legislature and SEA, long in the game of enforcing implementation of equity-bound mandates, hear much about the "urban overburden," according to one ASA administrator. However, they seem not to appreciate "rural overburden": overburden related to the fact that 20 percent of the people are dispersed across 90 percent of the land; overburden related to the fact that local prevalence[1] figures are lower than state incidence[2] figures; this in a state that funds on an excess-cost basis. Low prevalence and associated high costs of service provision due to sparcity are of critical concern to the ASA and the component LEAs.

Terrain and Climate

The mountains, beautiful to look at, are treacherous obstacles to overcome from a service delivery point of view. The ASA has circumvented this problem in relation to telecommunications via its TV translator system. However, the necessity of face-to-face communications is another matter entirely.

Often the Master Teacher cannot get to outlying LEAs, not because of the terrain or weather singularly, but because weather renders the terrain impassable. Thus, necessary visits or even friendly chats with her team members must be delayed.

These two factors affect transportation as well. The state requirement for time-in-class is met, but not without difficulty in cases where the weather is not bad enough to close schools but is bad enough to hamper normal pickup and delivery durations.

Given the frequency of heavy snowfalls and the ruggedness of the terrain, the schools do go about their business with amazing regularity.

Distance

The 2,050 square-mile ASA catchment area is larger than the state of Rhode Island. Two of the component districts are over 100 miles apart. Yet, compared to some rural areas, these distances are minimal. Distance, however, does create some minimal problems. It affects personnel deployment patterns since psychologists, for example, are assigned to LEAs on the basis of where they live.

---

[1] Prevalence refers to the number of handicapped students actually existing at a particular point in time.

[2] Incidence is the estimated rate of occurrence of a handicapping condition.

Interactions of the Big Four

Sparsity is usually a reason for two or more LEAs to share program services for handicapped students. When this occurs, some of these students are transported away from their home LEAs. Low-incidence populations of handicapped students typically travel further to receive educational services. ASA personnel also spend time behind the wheel, either to provide services or to support them.

Enter terrain and climate. These two factors themselves interact; and when applied to the factor of sparsity, problems of student and service personnel meeting travel commitments cannot help but be exacerbated.

All of these occur across distances that, relative to rural America, are about average; yet relative to urban and suburban areas, these distances are considerable. Thus, both handicapped students and their service personnel must grapple with not one, but four interrelated barriers. Their effects on quality services cannot be dismissed.

WHAT CAN BE LEARNED FROM THE FOOTHILLS CASE?

The preceding pages should have given the reader a "feel" for what it is like to live in the Foothills area; they should have provided a vicarious experience as seen through the eyes of the local participants. If we have been successful in providing such a "thick description," the reader by now will feel quite familiar with the Foothills ASA, its circumstances, and its issues.

And thus the question: "So what?" What can one make of all this? Is there anything to be learned? There are of course many lessons--although the reader should be careful not to assume that these lessons are generalizable to other such agencies indiscriminately. Indeed, a further reason for providing so much thick description is to make it possible to reach a judgment about the degree of similarity between Foothills and any other site to which a reader might wish to transfer the findings. If there is a high degree of similarity, transfer might be appropriate--but even then distinction is the better part of interpretation.

No doubt the reader will already have drawn many lessons for himself or herself, depending on particular interests or concerns. The purpose of this section is not to point to all possible lessons but to focus on a few that seem to be of special importance. The particular selection is of course a subjective matter, but it has not been made haphazardly. Instead its seeks to emphasize those matters that seem particularly salient at the site itself, or that are of special national interest at this particular time.

We began by describing the area: its demography, its people, its politics and its Area Service Agency: The Foothills ASA. The ASA serves 21 component LEAs which, alone, probably would be unable to deliver educational services of the quantity and quality that the ASA brings to bear. We also indicated that all of this happens within a heavily bureaucratic, state-level organizational structure. A distinguishing characteristic of this structure is that it renders coterminous the region comprising the 21 component LEAs for supervisory purposes and the region served by the ASA. The supervisory function and the service function are headed by one individual: the District Superintendent of the Foothills Supervisory District/Director of the Foothills ASA.

Wearing these two hats was not the whimsical, unilateral decision of one person, nor was it the carefully planned result of a series of organizational enablers. Rather, it was the consequence of years of patchwork at the state level involving legislative initiatives and mandates, a series of regulatory revisions and refinements, and an executive bureaucracy that sprouted--not unlike roots on the eyes of a potato in the dark. From this we learn that:

Lesson 1: STATE-LEVEL ORGANIZATIONAL COMPLEXITY AND BUREAUCRACY AREN'T CREATED IN ONE FELL SWOOP; NOR ARE THEY NECESSARILY CREATED WITH PURPOSEFUL CONTINUITY. INSTEAD THEY EVOLVE OUT OF ANTICIPATED NECESSITY.

In this context, the ASA and the LEAs go about the business of implementing state policy in the local context. Here, we see that state edicts (policy-in-intent) and local implementation (policy-in-implementation) are processes, not events.

As processes, they must be shaped and sculpted through negotiation. State and local officials must perceive and adapt to one another's constructions of the world. Foothills area officials tend to wonder about state policymakers' awareness of local needs and local realities. State level staff wonder about local understanding of the rationale for and tenets of state policy.

In the midst of all this are the handicapped children and youth of the area: the commonality of interest to both camps, the objects of state policy, the objects of local implementation. Should their needs not be met, handicapped students and their parents can blame the state--bureaucratic, uncaring, yielding to urban interests. Or they can blame the schools--lacking the services, the personnel, the commitment to the child.

At the risk of hedging, neither are singularly to blame. Both the state policymakers and the local implementors must arrive at the same wavelength if policy-in-intent and policy-in-implementation are to become congruent. Thus, we discover that:

Lesson 2: CONTINUITY BETWEEN POLICY MAKERS AND POLICY IMPLEMENTORS IS A PROCESS; A PROCESS IN WHICH POLICY IS MADE AT THE TOP, IMPLEMENTED TO FIT LOCAL REALITIES, AND KICKED BACK TO THE TOP FOR ADAPTATION. ALL OF THIS REQUIRES PERCEPTIVE COOPERATION NOT ADVERSARIAL NEGOTIATION AMONG CONCERNED STAKEHOLDERS.

We often refer in this case study to the issue of local autonomy. It is an issue that perhaps more than any other is unbending and unyielding as far as the local perspective is concerned. From the state's perspective, it is, at best, an ever present consideration and, at worst, a barrier to the implementation of educational policy.

As we've said, local autonomy as an issue has a long history. Its roots are in the ethnic history and identity of the Foothills hamlets. Its fire has been fueled throughout the years by school consolidations. The continuing trend toward larger supervisory districts/ASA regions merely fans the fire.

Across rural America, as well as here in the Foothills area, the drive to retain local control will not be extinguished. Indeed we see a seemingly endless cycle of state mandates and regulations followed by varying degrees of local compliance and resistance. But, we learn that:

Lesson 3: ANY FACET OF EDUCATIONAL OPERATIONS THAT CAN BE CONTROLLED AT THE LOCAL LEVEL WILL BE CONTROLLED THERE.

While at the same time holding on to all that can be controlled at the local level, local residents and officials concerned with special education are quick to remind you of the lack of equity between the services available to their school districts and those available to urban and suburban school districts. Yet, there appear to be two equity issues--both of which are impacted by the ASA as a service delivery mechanism.

The first, of course, is the urban/rural dichotomy with regard to equity in services. Within this issue, urban and suburban districts should be seen by Foothills officials as two points of reference not one. From the Foothills perspective, urbans are land- and dollar-poor, thereby receiving more in the way of resources from the state than do the Foothills districts. Suburbans are land- and dollar-rich, thereby sufficiently wealthy to generate their own resources, again unlike the Foothills schools. From both these standpoints, the ASA diminishes the effects of these inequities. With an expert, sophisticated staff, the ASA makes the most of both its own and its LEA's resources. It accomplishes this maximal diminution of rural/urban and rural/suburban inequity through collaboration with its LEAs, with agencies like the ARC, and from within its own ranks: SETRC, CRSE, and occupational education.

Its collaborative activities not only diminish but also ameliorate the second equity issue: rural by rural equity. At the outset of this case study, we made the point that ASAs function as a service mechanism which LEAs share, a mechanism without which LEAs alone would not be able to offer services of the same quantity and quality. Comparatively, these rural school districts do well by their students--handicapped and nonhandicapped alike.

The collaborative achievements of this ASA in regard to its services have at least made a dent in the discrepancy between urban and rural (and, we might add, suburban and rural) services. Also, these achievements have undoubtedly afforded the majority of Foothills handicapped students quality services that wouldn't have been available in any single local district, and that equal or exceed those available in most rural areas. And so we discover that:

Lesson 4: WHILE THE HIGHWAY TO EQUITY MAY VERY WELL BE PAVED WITH FISCAL MACADAM, THE TWO-LANE ROAD TO EQUITY IS TRULY PAVED WITH COLLABORATION AMONG AND WITHIN SERVICE AGENCIES.

We have painstakingly described the nooks and crannies of the ASA's functions and the collaborative nature of their services. In reviewing the data resulting from the interviews conducted and the documents examined, more than a few paradoxes emerged. The most compelling of these relates to the effects of the size of the schools. Smallness can be bad; it can also be good.

Perhaps we've carped enough about its negative effects, and not expanded upon its more positive virtues: closeness among people, flexibility in procedural matters, and most importantly, collaboration. The

District Superintendent/ASA Director and the Director of Special Education are masters at putting smallness to use beneficially. The ASA Director/Superintendent presides over both the cross-fertilized collaboration within the ASA and the collaboration among the component LEAs. All of these efforts hinge on the facilitative nature of the small agencies involved. Although communication is hampered to a degree by the interaction of the area's sparsity, distance, climate, and terrain factors, it is also enhanced by the bureaucratic simplicity of the LEAs and the interpersonal nature of the collaborative efforts. In short, size can be boon as well as a barrier. From this, we see that:

Lesson 5: ONE MUST NOT BE HASTY IN CRITICIZING SMALL SCHOOLS ON THE BASIS OF SIZE ALONE. IN FACT, THE TYPICAL METHOD FOR REDUCING THE NEGATIVE EFFECTS OF SMALLNESS, COLLABORATION, ITSELF CAN BE FACILITATED BY SMALLNESS--THE VERY PROBLEM IT PURPORTS TO OVERCOME!

Once institutionalized, the limits to collaboration exist only in the minds of the shortsighted. One of the most personalized forms of collaboration is that which results in the true mainstreaming of a handicapped student, true in the sense of an appropriate education in that student's least restrictive learning environment. We have attended almost exclusively to the mainstreaming of LD and EMR students. However, we also reported that, on a state-wide level, and indeed, in the national arena, a parallel movement of students toward their least restrictive environments is also occurring.

This is certainly the case in regard to high functioning visually impaired and hearing impaired students, formerly residing in state institutions, and now being educated in their home LEAs around the state. Their present teachers admittedly need more in the way of instructional skills to fully provide this least restrictive environment. Yet, those who could best provide these skills themselves remain in the state schools for the deaf and blind!

Still in the blueprint stage is a collaborative effort, to be orchestrated by SETRC, that would bring these teachers into the LEAs to train regular educators to better serve sensorily handicapped students. This leads us to conclude that:

Lesson 6: LEAST RESTRICTIVE ENVIRONMENT EDUCATION SHOULD INCLUDE A FOCUS ON TEACHERS AS WELL AS ON STUDENTS. COLLABORATION COULD BE THE VEHICLE BY WHICH THE NECESSARY TEACHING EXPERTISE FOR MAINSTREAMING FOLLOWS STUDENTS ACROSS THE CONTINUUM OF SERVICES.

It should come as no surprise that the teaching expertise necessary for true mainstreaming is as much an art as it is a science. Paramount are the art of communication and the science of hard work. The art of communication is a given; the science of hard work apparently isn't. Until all educators, hardworking or not, appreciate the importance of the latter--demonstrated vivaciously by many of the Foothills ASA and LEA staffers; may we offer the conclusion that:

Lesson 7: THE RIGHT OF THE HANDICAPPED TO A FREE APPROPRIATE EDUCATION IN THE LEAST RESTRICTIVE ENVIRONMENT ULTIMATELY IS FULFILLED IN THE TRENCHES BY THOSE WHO VIEW EDUCATION AS A MISSION AND ARE NOT AFRAID TO GET THEIR HANDS DIRTY.

Finally, if one poses the question, are the purposes of Regulation 77 and of P.L. 94-142 being met in the Foothills area, one would have to venture a guarded "mostly, but not completely." But in view of the lessons learned so far, one is hardly in a position to fault the locals for any partial failure. Of course one might argue that state policies and regulations could be more stable, that governance could be simpler, and so on. Any operation can be improved. But most of the issues of the Foothills area are brought on by contextual factors rather than internal lapses.

At the same time, there is little doubt that Regulation 77 and P.L. 94-142 have had a salutary effect on the delivery of ASA- and LEA-based services to the handicapped. While the component LEAs did recognize their responsibilities, it is questionable whether the effort would have reached its present level without the impetus provided by state and federal legislation and by the creation of the ASAs. It is undoubtedly also the case that there is a long way to go in meeting the ideal of Regulation 77 and P.L. 94-142 to provide a free appropriate public education in a least restrictive environment for every handicapped child and young adult. And so, having almost come full circle, a final lesson:

Lesson 8: HUMAN SERVICES SUCH AS SPECIAL EDUCATION CAN BE CREATED BY MANDATES, BUT THEY ARE IMPLEMENTED BY PEOPLE. POLICY MAKERS MUST TRULY UNDERSTAND THE CONTEXTS IN WHICH THEIR POLICIES ARE IMPLEMENTED. ONLY THEN WILL THE IDEALS BEHIND THE POLICIES THEY MAKE BE REALIZED.

Appendix F

Site #4 Case Study

The Seaside Regional Education Center

THE SEASIDE REGIONAL EDUCATION CENTER:

A CASE STUDY

The fourth of five case studies appended to
Interorganizational Special Education Programming in Rural Areas: Technical Report on the Multisite Naturalistic Field Study

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

April 22, 1983

© 1983

Department of Special Education
School of Education
University of Kansas
Lawrence, Kansas 66045

"The work upon which this publication is
based was performed pursuant to Contract No.
400-81-0017 of the National Institute of
Education. It does not, however, necessarily
reflect the views of that agency."

TABLE OF CONTENTS

Page

LIST OF TABLES iii

LIST OF FIGURES iv

SECTION

1 Introduction to the Area 1
- Local Education Agencies 3
- Regional and County Demographics 3

2 State Education Agency 8
- Administration/Organization of the REC Network . . 8
- Role of the RECs 8
- State Level View of the RECs 10
- Division for Exceptional Children 11

3 Seaside Regional Education Center 15
- Demographics of the Seaside REC 15
- Governance and Administration of the REC 16
- REC Funding 18
- Organization and Services 19
- Exceptional Children Program Area 23

4 Evolution of Public Education 26
- Development of the Seaside Public Schools 26
- Evolution of Special Education and the RECs . . . 29

5 School Finance 33
- General Education Funding 33
- Special Education Funding 35

6 Local Education Agencies 43
- Governance 43
- LEA Funding 43
- Special Education Funding 46

7 General Education Programs 51
- Regular Education Programs 51
- Supplementary Programs 56
- Federal Programs 58
- Vocational Education Programs 63

8 LEA Special Education Programs 66
- Authority and Responsibility for P.L. 94-142 . . . 66
- Administration and Governance of LEA Special Education 66
- Compliance Monitoring 68

9 Identifying and Processing Handicapped Students 72
  Referral and Identification 72
  Screening and Evaluation 73
  Placement in Special Eduction Programs 75
  LEA Approaches to Least Restrictive Environment Education 81
  The Individualized Education Program 86

10 The Nature of Special Education Programs and Students 90
  Categorical Programs 90

11 Related Services 98
  Psychological Services 98
  Physical and Occupational Therapists 99
  Speech Therapy 99
  Administrative Consultation 100
  Related Service Agencies 100

12 Some Issues of Particular Concern to the REC 103

13 What Can Be Learned From the Case 131

LIST OF TABLES

Table		Page
1	Seaside Area Local Educational Agencies (1981-82) . . .	5
2	Number and Proportion of Exceptional Students by LEA and Categorical Aea	6
3	Division of Exceptional Children Performance Agreements	13
4	Proposed Weighted Instructional Unit System	41
5	Exceptional Children Teacher-Student Ratios	49

LIST OF FIGURES

Figure		Page
1	Seaside Area Map	4
2	Department of Public Instruction Organization	9
3	Seaside REC Organization	20
4	Present Funding Model	36
5	Present Funding Model and Recommended Funding Model with Equalization Fund and Required Local Effort . .	40

INTRODUCTION TO THE AREA

The focus of our story is a 15-county area in the southeastern corner of a southern state. The region is bounded to the west by the border of another state. And to the south--the Atlantic Ocean. Actually, "bounded by the ocean" does not adequately describe the area's relation to the sea. The two embrace each other--the land jetting outward, the sea reaching in with crooked fingers to clinch its hold on the land. And its hold on the land is more than physical. As our story unfolds, we will find that the area's proximity to the sea has played a central role in the development of the land and the people.

Area industries and economies are as diverse as the land and the people. Communities close to the water depend on fishing and resort industries. However, as one travels inland from any point, it is immediately apparent that agriculture is the mainstay of the region. Soybeans, peanuts, tobacco, peas, and cucumbers are the crops. Poultry production and processing, agricultural support industries, and lumber round out the region's agricultural enterprise. The flat coastal plains have made large-scale agricultural production feasible for many generations. It is not surprising then to find a considerable amount of farming but relatively few farm owners. Although there are some small-scale farms, 80 percent of the land has been passed down in large parcels through generations of families to its current owners.

Although most of the prime farm land is owned by relatively few people, much of it is worked by tenant farmers who tend to be poor and primarily black. During the various harvest seasons, migrant workers join the labor force as they follow the migrant stream up and then back down the eastern seaboard. About half the migrant workers are black also; Hispanics and whites making up the remaining half.

Garfield, the largest city in the region (population 20,000), supports several major industries. Locals as well as people from the surrounding counties, are employed by companies like Union Carbide, Dupont, TRW, and Proctor and Gamble. The remaining employers throughout the region are service and retail industries, local and county governments, and the public schools. Many of those who live in the northern counties of the region travel to a major seaport in the neighboring state to work in the shipyards and other heavy industries located there. The trek to the north has become increasingly popular of late as unemployment in the region has doubled the state average of eight percent, nearly tripling that figure in certain counties. Many of the small farmers who had managed to keep their land in the past have not been able to make it in recent years and have turned to fishing, heavy industry or shipyards outside the area, or to lumber production.

And as hard-pressed as some of the local people are, the opposite is true for many others. The land owners, of course, have enjoyed relative wealth for quite some time. Others, too, live in relative prosperity; but they are different. They have different accents, and they're not from around here. They have been drawn from all parts of the country by the "good life" that abounds where the climate is moderate and the land meets the sea in such glorious fashion. Fishing, boating, hunting, riding--the list goes on. One can do these things virtually year round.

But who are these people? Some have retired and, to them, this area represents the dreams they held for many years--truly, their vision of where hard work leads. Others, however, have many good years of work left to do. But why do it in crowded cities? Why continue to battle the elements? Why let oneself be taxed to death? They have discovered they can live here better for less. Although choice beachfront property does not come cheaply, a tax rate at about 72 percent of the national average makes living here very attractive. Once the initial investment is covered, low property taxes make the good life affordable again.

And so we get our first glimpse of the diversity of the area. As we said, the people are as diverse as the land. Of course, most of the people are average; they are not rich, not poor. They work, they play, they are happy most of the time. Even the newcomers are little more than average. Certainly, they have amassed some wealth; but that's where we all hope to be someday. But it's the extremes that are striking--those who have always been powerful, those who have always been powerless.

Business and politics aside, the land, too, is diverse. On approaching the sea from the north and west, we note that the land is blanketed in a dense cover of juniper and dogwood. The juniper grow so straight and tall that the roadways that wind through them rarely see the full light of day. From the car, the sun through the trees creates a strobe effect that can be disorienting. A red blanket of dried needles has come to rest under the trees. Ground cover is kept at a minimum by the constant fallout. And, if one looks hard, cleared farmland can be distinguished, carved out neatly just behind the wall of timber left bordering the blacktop.

As we approach the sea, the trees thin out to reveal more and more of the marshy land that characterizes most of the area. Building roads here is no simple matter. Pilings must be sunk deep to support the roadbed.

And, if the sight of the ocean weren't enough, the way it intermingles with the irregular coast line is truly breathtaking. It's plain to see why one would want to be as close to all this as possible. Inlets, coves, wooded islands off shore--they couldn't have picked a better spot to put the "good life." But as we have noted, life is not good for everyone.

But what brings us to this area? Why these 15 counties? How are they related? We are here to see how special education services are delivered through the efforts of the local school districts. Helping in this endeavor is the Seaside Regional Education Center (REC). The Seaside REC is one of the seven such agencies created by the state to help local school districts provide a number of educational services, including special education. Within this context, we are here to see the impact of P.L. 94-142, the Education for All Handicapped Children Act, on the education of handicapped students and the agencies that serve them.

Each REC serves a specific geographical area and provides its services to the local school districts which are included in it. Much more will be said about the nature of the Seaside REC as our story progresses. For now, however, we would like to focus on the local school districts which make up the Seaside catchment area. In the following section we look at state level organization.

Local Education Agencies

The 15-county Seaside area covers nearly 9,000 square miles and includes 17 local education agencies (LEAs) serving about 61,000 students in grades kindergarten through twelve. The number of LEAs included in the service areas of each of the seven RECs is relatively constant, ranging from 17 to 21. The number of students served, however, varies widely. The Seaside REC is one of two major rural RECs in the state. The other rural REC is located in the mountains of the extreme northern part of the state. Of the 17 LEAs served by the Seaside Center, 15 are county districts and 2 are city districts located within 2 of the counties. In all, the 17 districts maintain a total of 127 schools. Figure 1 shows the distribution of the 15 county and 2 city LEAs within the Seaside area. The relevant demographic data for each of the 17 public school systems are shown in Table 1.

Table 2 displays the number of handicapped and gifted youngsters in each LEA and the percent of total school enrollment so identified. Of note are the percentages of total enrollment for learning disabled (LD), educable and trainable mentally handicapped (EMH & TMH), and emotionally handicapped (EH) students compared with state and national prevalence figures. The Seaside area's percentage of LD students (4 percent) exceeds both state (3.6 percent), and national (3.3 percent) prevalence figures; while in EH, the area and state (.35 percent) are a little more than half the national average of .6 percent. The largest discrepancies, however, are between the regional and the state EMH/TMH prevalences (3.4 and 2.8 percent, respectively) and the national average of 1.44 percent. More will be said about these data later in the case.

Regional and County Demographics

This is one of the most rural southern states, yet it is near the top 10 in population size in the country. The combination of population size plus rural residence may seem paradoxical; its logical accompaniment is a high density of population spread over a wide area. Despite its relative lack of metropolitan centers, the state shows a ratio of population to square miles of land area almost twice that of the nation as a whole, 112 to 61. So the population of the state is relatively large for the South, lives outside metropolitan areas, and is densely settled in those areas.

Changing Population

Like the rest of the southern states, this state is experiencing population growth. A greater proportion of normal population growth is staying in the state and people are migrating here from other parts of the country. More than any other southern state, however, growth here is in the rural areas.

Figure 1

Seaside Area Map

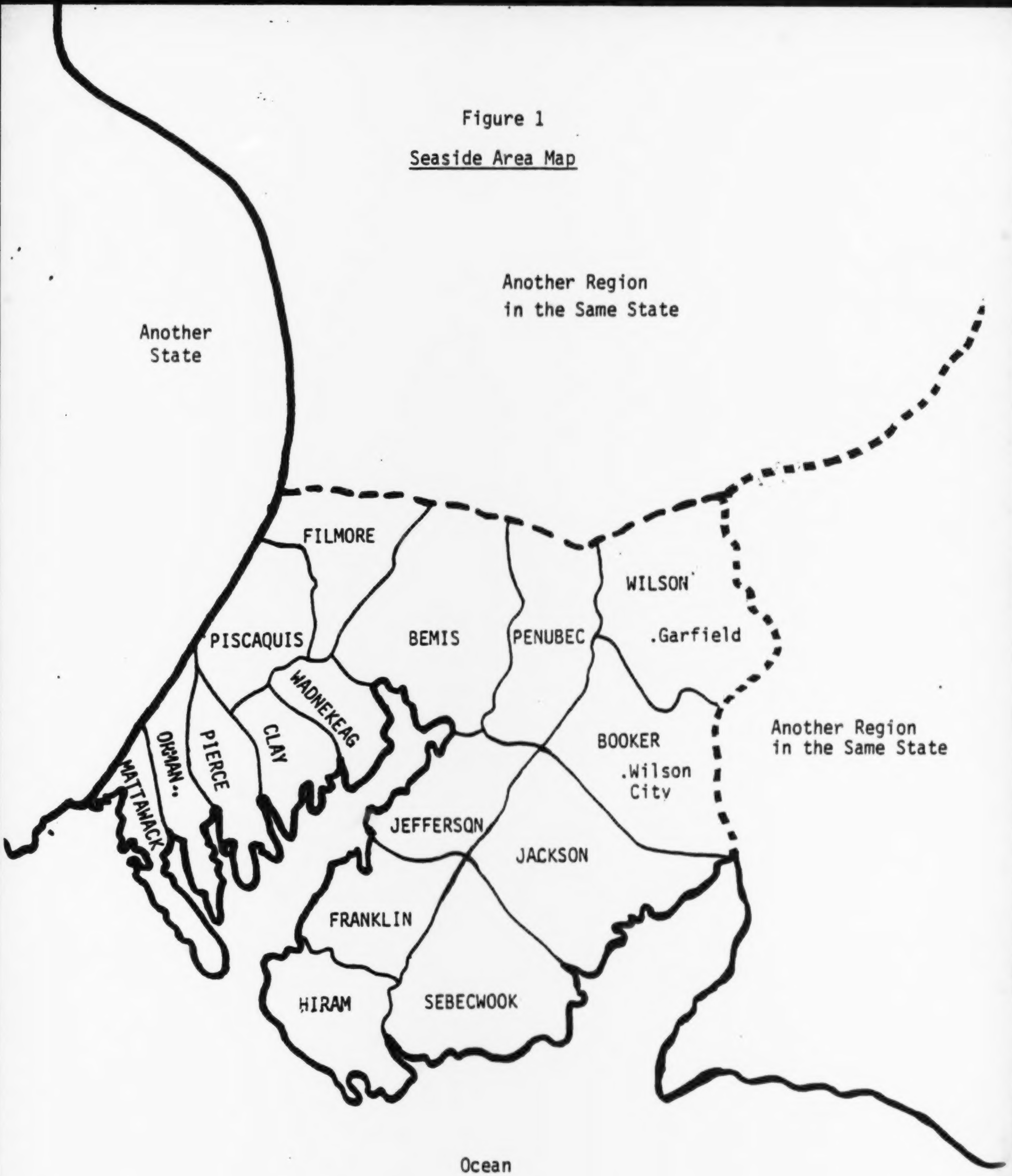

Another Region
in the Same State
Another
State
FILMORE
WILSON
PISCAQUIS
BEMIS
PENUBEC
.Garfield
WADNEKEAG
OKMAN..
PIERCE
CLAY
MATTAWACK
BOOKER
.Wilson
City
Another Region
in the Same State
JEFFERSON
JACKSON
FRANKLIN
HIRAM
SEBECWOOK
Ocean

Table 1

Seaside Area Local Education Agencies (1981-82)

School Districts	Number of Schools	Enrollment	Faculty	Pupil/Teacher Ratio
Booker	9	4,404	231	19
Wilson City	5	3,783	199	19
Bemis	10	4,643	239	19
Orman	3	1,243	67	19
Wadnekeag	6	2,563	153	17
Mattawack	6	2,265	113	20
Hiram	4	2,100	110	19
Piscaquis	6	1,767	103	17
Filmore	8	4,703	241	20
Sebecwook	4	1,146	70	16
Penubec	14	5,585	318	18
Pierce	9	5,310	291	18
Clay	4	1,676	98	17
Wilson	20	10,903	645	17
Garfield	10	4,924	268	18
Franklin	2	786	48	16
Jefferson	7	3,268	174	19
Total	127	61,068	3,368	18

Table 2

Number and Proportion of Esceptional Students by LEA and Categorical Area

Local Education Agency	Categorical Area																				Total Average Daily Membership	Total Enrollment of Exceptional Students	Total Percentage of Exceptional Students	Total Percentage of Handicapped Students[1]
	Educable Mentally Handicapped		Learning Disabled		Emotionally Handicapped		Trainable Mentally Handicapped		Severely/ Multiply Handicapped		Visually Impaired		Hearing Impaired		Speech Impaired		Physically and Other Health Imp.		Gifted/ Talented					
	#	% ADM	#	% ADM	#	% ADM	#	% ADM	#	% ADM	#	% ADM	#	% ADM	#	% ADM	#	% ADM	#	% ADM				
Booker	160	4	104	4	0	0	10	0	2	0	0	0	0	0	141	3	1	0	79	2	4,552	577	13	11
Wilson City	106	3	162	6	8	0	6	0	6	0	0	0	0	0	147	4	2	0	230	6	3,961	655	17	11
Dorais	242	5	79	2	0	0	38	1	9	0	0	0	0	0	100	2	0	0	76	2	4,677	553	12	10
Bruno	75	6	84	7	1	0	7	1	3	0	4	0	0	0	23	2	3	0	66	5	1,258	265	21	16
Wadnetong	91	4	124	5	3	0	10	0	30	1	0	0	0	0	14	1	0	0	105	4	2,543	305	15	11
Rattawock	53	2	129	6	20	1	0	0	0	0	0	0	1	0	63	3	14	1	120	6	2,120	414	19	13
Hiram	21	1	112	5	5	0	6	0	1	0	2	0	0	0	27	1	2	0	96	4	2,147	272	13	8
Piscaquis	67	4	49	3	0	0	5	0	3	0	0	0	0	0	21	1	2	0	60	4	1,752	212	12	8
Filmore	214	5	138	3	8	0	22	0	0	0	2	0	2	0	78	2	4	0	195	4	4,677	664	14	10
Sebocumok	40	3	39	3	1	0	9	1	1	0	2	0	1	0	50	5	2	0	38	3	1,165	184	16	13
Bonubox	102	2	219	4	14	0	30	1	9	0	0	0	0	0	95	2	6	0	75	1	5,737	537	9	8
Pierce	91	2	362	7	16	0	20	0	14	0	3	0	2	0	150	3	4	0	511	10	5,222	1,173	22	13
Clay	75	4	49	3	0	0	13	1	0	0	0	0	1	0	30	2	2	0	146	8	1,748	326	19	10
Wilson	462	4	540	5	67	1	55	1	26	0	4	0	25	0	360	3	37	0	587	5	11,327	2,103	19	13
Garfield	121	2	302	6	113	2	19	0	2	0	2	0	84	2	200	4	21	1	378	8	4,953	1,246	25	18
Franklin	37	4	44	6	0	0	3	0	8	1	1	0	0	0	42	5	0	0	0	0	768	130	17	17
Jefferson	219	7	126	4	3	0	19	1	0	0	0	0	0	0	116	4	5	0	169	5	3,283	657	20	15
Totals/Averages	2,114	3	2,704	4	259	0.4	272	0.4	122	0.2	19	.03	116	0.2	1,604	3	111	0.2	2,958	5	61,401	10,351	17	12

[1] Doesn't include Gifted/Talented

Note: Zeros in the ADM columns where the number in the headcount figure is one or more have been rounded. The actual percent is less than one.

BEST COPY AVAILABLE

Naturally, growth patterns are different on both an intrastate and intraregion basis. The Seaside region is experiencing the greatest growth in the state and, moreover, the intraregion differences are distinct. The inland counties, which tend to be the poorer ones, have the highest birth rates and the lowest in-migration. The coastal counties, which tend to be the wealthier ones, have the lowest birth rates and the highest in-migration. The result, of course, is reflected in the proportion of school-age population for individual counties and the resultant burden placed on local economies.

Changing Economies

Can local economies bear the weight of the increased demands placed upon them by changing populations? Again, this varies by county in the Seaside region. Near the middle of the southern states in per capita income, the average resident of this state brings home about 85 percent of the national average. A more sensitive measure, however, is family income. Here, this state is about average for the region with 12 percent of its families living below the poverty level. However, in the Seaside region, the figure is 20 percent on the average. Naturally, the poorer counties fall somewhat higher than this figure. Are things getting better? Yes. For the southern states as a group, the rate of economic growth surpasses the national rate. But, this state's growth rate is below that of all other southern states except one. Again, the rate of growth varies by county within the Seaside area.

STATE EDUCATION AGENCY

The Department of Public Instruction (DPI) is organized into three primary areas which subsume 18 divisions. Each area is administered by an assistant superintendent. In addition, four special assistants to the superintendent are responsible for management, communications, research and federal programs. Figure 2 depicts the DPI table of organization.

Resting at the top of the administrative hierarchy is the State Board of Education. Just under the board sits the state superintendent, an elected official who currently is serving in his third four-year term. The state superintendent based his first campaign on the promise to decentralize the DPI via the REC concept. He was elected in 1969, started the REC network in 1971 and has held the post ever since. There are those who believe that the reason for the success of the REC concept is that there has been one top administrator from the beginning.

Further down the DPI hierarchy, we find the deputy state superintendent and the associate superintendent, who, among his other responsibilities, is responsible for the RECs.

Administration/Organization of the REC Network

In his capacity relative to the RECs, the associate superintendent coordinates activities within the state's seven educational districts; each district served by one REC. Each REC is organized into program areas which replicate the various divisions of the DPI depicted in Figure 2. Although the associate superintendent is responsible for the RECs and the directors of each of the RECs report directly to him, each REC program area coordinator is responsible to his or her respective division director within the DPI hierarchy. So, for example, the coordinator of the exceptional children program area within any given REC is responsible to the State Director of Programs for Exceptional Children.

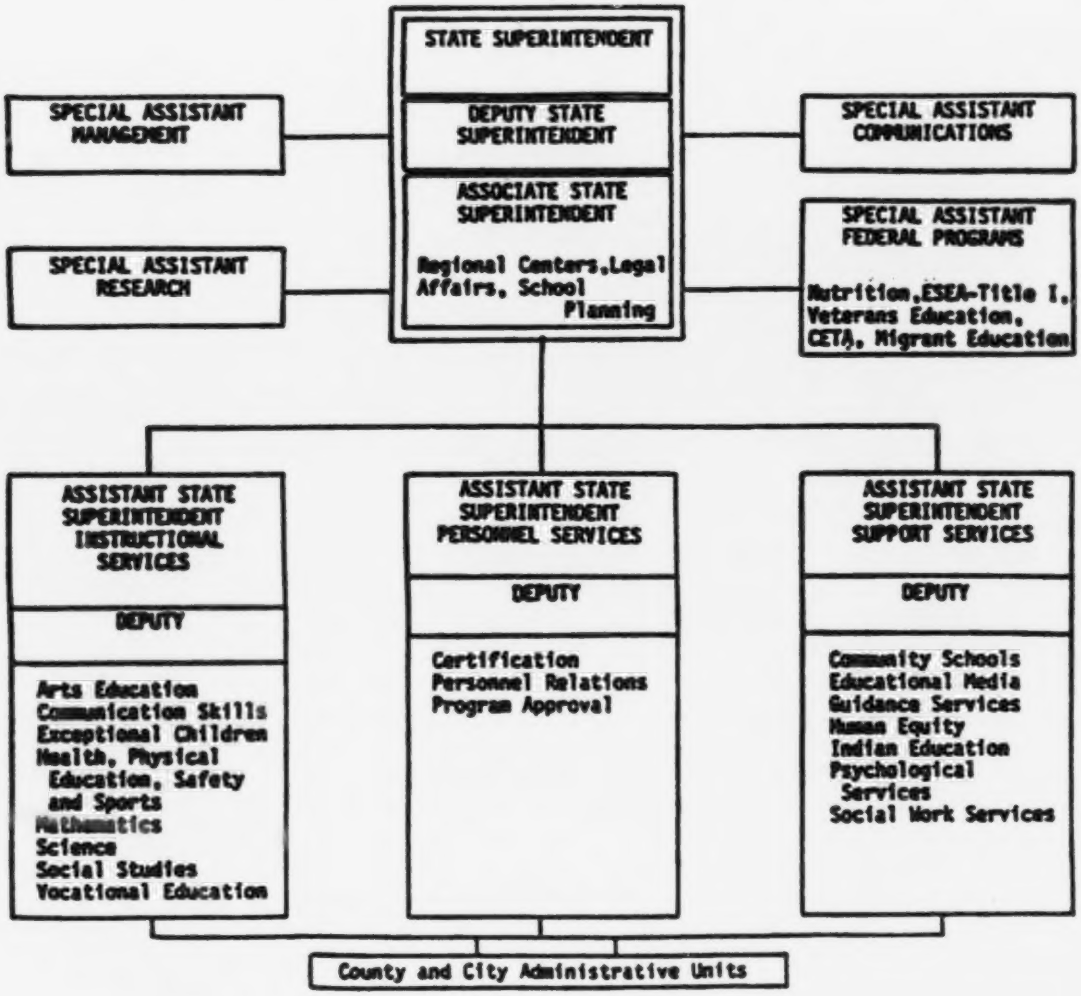
An indication of the importance of the RECs in the DPI organization is the representation of the REC directors on the Superintendents Executive Council. The group meets monthly to share information and plan. It includes each of the seven REC directors, the associate and deputy superintendents, the three assistant superintendents, the four special assistants, and is chaired by the superintendent. Thus, the REC directors have direct accesss to top level DPI administration on an ongoing basis. The Seaside director considers the Council to be one of his vehicles for representing his LEAs to the DPI.

Role of the RECs

The REC network was created to make the DPI more responsive to local school districts. Although other models were considered, intermediate units, for example, they were rejected because they were viewed as creating "another administrative level." The decision was made to decentralize the DPI and to establish centers on a regional basis that would function as service or technical assistance vehicles. Specifically, the RECs were assigned the following functions:

Figure 2

Department of Public Instruction Organization


STATE SUPERINTENDENT
DEPUTY STATE SUPERINTENDENT
ASSOCIATE STATE SUPERINTENDENT
Regional Centers, Legal Affairs, School Planning
SPECIAL ASSISTANT MANAGEMENT
SPECIAL ASSISTANT RESEARCH
SPECIAL ASSISTANT COMMUNICATIONS
SPECIAL ASSISTANT FEDERAL PROGRAMS
Nutrition, ESEA-Title I, Veterans Education, CETA, Migrant Education
ASSISTANT STATE SUPERINTENDENT INSTRUCTIONAL SERVICES
DEPUTY
Arts Education
Communication Skills
Exceptional Children
Health, Physical Education, Safety and Sports
Mathematics
Science
Social Studies
Vocational Education
ASSISTANT STATE SUPERINTENDENT PERSONNEL SERVICES
DEPUTY
Certification
Personnel Relations
Program Approval
ASSISTANT STATE SUPERINTENDENT SUPPORT SERVICES
DEPUTY
Community Schools
Educational Media
Guidance Services
Human Equity
Indian Education
Psychological Services
Social Work Services
County and City Administrative Units

1. Provide effective liaison between the state education agency and local education agencies, area post secondary educational institutions, community organizations, and agencies.
2. Coordinate and interpret state education agency policies, programs, and services for local education agencies served.
3. Identify and interpret local education agency needs to the state education agency.
4. Assist in the development and implementation of educational programs which will enhance educational opportunities for all students.
5. Encourage cooperative action among local education agencies when it will result in mutual benefits to the participants.

State Level View of the RECs

The view from the DPI is very postive. The state superintendent ran initially on a "decentralized" ticket and continues to maintain his support for the concept. The associate superintendent's highest aclaim for the RECs is that they are "a super communication device." And he is quick to add that this communication is at least two-way; needs are identified locally, locals' views on issues are easily obtained, locals know more about what is going on both in the region and at the DPI. Moreover, the associate superintendent feels that there is a feeling of closeness under the REC concept. "Before the RECs, DPI was this nebulous place." He believes that this has been turned around and that the locals have "bought a piece of the idea." They see the REC as "our center."

One should not assume, however, that the REC concept is without at least some criticism within the DPI. It appears that there is some concern among DPI division directors that the RECs align themselves too closely with their LEAs. This seems ironic when one considers the intent of the concept to bring the DPI and the LEAs closer together. The concern centers on the notion that some RECs tend to protect the LEAs from the DPI. The state's position is that the RECs should avoid this posture since, after all, the RECs are the DPI. The fear is that the RECs will avoid pointing out to the LEAs those instances in which DPI policy might be compromised. The message given to REC staff is that policy and regulations still emanate from the state and that as DPI employees it is their responsibility to uphold the state's position.

Some REC's and, indeed, some DPI division directors continue to hold a "we-they" posture toward one another. Some RECs perceive themselves as a "mini-DPI," but the state directors are quick to point out that there is only one DPI; it's just decentralized.

The RECs have not always enjoyed support from state government. On several occasions, movements to abolish the RECs have been mounted within the General Assembly. One source of pressure is county commissioners, a formidable political power at the county level (explained more fully later in the case). Even a single teacher, it is believed, can get some action out of the legislature if pressure is applied through the right channels. There is even some support for the idea that the REC concept has been attacked simply to get at the state superintendent, who, in effect, has based his platform on the idea. In any event, there are those who, for one reason or another, would dismantle the RECs if they could. But, so far, the REC concept has been able to withstand the periodic heat.

Division for Exceptional Children

Currently, the division subsumes 112 of the 600 total DPI professional staff positions, and includes staff located centrally as well as those who operate out of the seven RECs. The division is charged with the following responsibilities.

1. Assist local school systems in developing comprehensive programs and services for all children with special needs.
2. Provide consulting services for the following types of children: autistic, gifted and talented, hearing impaired, multihandicapped, mentally handicapped, orthopedically handicapped, other health impaired, pregnant, handicapped, visually impaired, and children that require homebound or hospitalized services.
3. Provide technical assistance in planning, program development, program evaluation, staff development, and effective use of media and materials for exceptional children.
4. Coordinate the activities of the Regional Support and Technical Assistance Services.
5. Coordinate the efforts of the regional staff development services for training for regular classroom teachers.
6. Administer ESEA Title VI, Parts, B, C, and D of the Education of the Handicapped Act.
7. Provide interagency cooperation and coordination to services provided by the Department of Human Resources to the public schools and in-state operated programs for school-aged handicapped students.
8. Work cooperatively with other Divisions in the State Department of Public Instruction to mesh appropriate service delivery for handicapped children.
9. Provide technical assistance in planning and program development to the Departments of Human Resources and Correction regarding exceptional children programs.

Implicit within these activities is the responsibility for the implementation of P.L. 94-142 and the corresponding state special education law, as delegated by the state board. As one might expect, this responsibility carries with it the role of monitoring the implementation of the Act in local education agencies. And until the 1981-82 school year, this was the case. During the summer of 1981, however, because of a reduction in the state allocation of funds to the division and the subsequent loss of 14 staff positions, the responsibility for monitoring local compliance was passed on to the RECs. This meant that, in addition to their technical assistance role, the REC's exceptional children area staff were required to monitor the very agencies they are trying to help.

Initial reaction to this reformulation of the REC special education role was less than enthusiastic, as one might expect. Although, the balance between "helping hand" and "heavy hand" seems to have been accomplished without major administrative casualties, it has not transpired without its share of problems. More on this later in the case.

State Advisory Council

About $15,000 of the state's P.L. 94-142 VI-B monies fund the activities of the State Advisory Council on Educational Services for Exceptional Children. These activities include providing DPI with input concerning their policies for the education of handicapped students. The committee is comprised of professionals as well as concerned lay persons.

Relationship to Other State Agencies

The Division for Exceptional Children maintains seven "performance agreements" with state agencies regarding various aspects of the education and/or habilitation of exceptional students. Each agreement specifies its purpose and lays out the specific responsibilities of each agency with regard to the services to be provided. Table 3 summarizes the nature of the agreements.

Besides these formal arrangements with other state agencies the Division for Exceptional Children maintains cooperative relationships with other DPI divisions. It is common for the division to join with program staff from other divisions to pursue common goals. These same collaborative relations are reflected in the interactions among REC staff who work in the corresponding program areas. More will be said about the nature of such relationships as the story progresses.

Governor's Advocacy Council

The Governor's Advocacy Council evolved from the original Governor's Council on the Employment of the Handicapped. It's role is to act as an advisory group to the Governor in matters concerning disabled persons including, but not limited to, handicapped students.

Table 3

Division of Exceptional Children Performance Agreements

With	For
Department of Human Resources, Division of Health Services	Supplemental Security Income Disabled Children's Program
Developmental Evaluation Centers	Evaluation and assessment services eligibility and reimbursement
State Training and Technical Assistance Office	Head Start eligibility and services
Division of Mental Health and Mental Retardation and Substance Abuse Services	Mental health centers services and reimbursement
Department of Human Resources and the Administrative Office of the Courts	Guidelines for compliance with P.L. 94-142
Division of Vocational Education and Department of Human Resources, Division of Services for the Blind	Vocational education services for the blind and visually handicapped
Department of Human Resources	Referral process

Since the passage of P.L. 94-142, the council has been tagged with the reputation of being a "pressure group." Indeed, while they have no policy-making powers, they are able to communicate concerns they hear in the field to the appropriate state agencies such as the DPI.

The Council gets its input most often in the form of complaints from parents. About half of these complaints actually originate with service providers, usually educators, who encourage parents to file the complaint.

SEASIDE REGIONAL EDUCATION CENTER

The General Assembly created the REC network to make the DPI more responsive to the needs of the people through decentralization. An allotment of DPI staff positions, formerly based in the state capitol, were reallocated to seven RECs throughout the state. The Seaside REC was one of the first two centers to be established. The first two centers were set up in 1971-72 and the rest were developed incrementally over a six-year period. The Seaside agency began with a director and one secretary and evolved over 10 years to its present configuration (described in the next section). The history and politics of the creation of the REC concept will be discussed in the section "Evolution of Public Education."

The general role of the RECs is to provide LEAs with services that "maximize the educational opportunities for all students." The Seaside REC carries out its responsibilities in this regard through two main vehicles: consultative and media services. It provides services directly and facilitates other services through collaboration among LEAs and between LEAs and other agencies. Furthermore, the REC acts as a regional link between the DPI and local districts. The REC is the voice of the LEAs with the DPI and an interpretor and facilitator of DPI policy at the local level. Originally, concern was expressed that the RECs would become "just another administrative level" for the locals to contend with. However, that fear has never been realized in the Seaside region. In fact, all indications from REC, LEA, and DPI staff suggest that the REC has become more closely aligned with the locals than with the DPI -- a situation that is of some concern to DPI.

The REC provides no direct services to students. Rather, its services are provided to the professional staffs of its member LEAs on a request basis. Even in its role as a facilitator of collaboration, the REC acts as a "neutral party." One might say that the REC is a "broker," helping to get people and agencies together to solve problems and address needs. And, although the original intent was to have the REC facilitate implementation of state educational policy, here too the REC has become a broker, or better, a "buffer." REC staff are in a unique position to guage the local capacity to respond to state policy proposals before they are implemented. The REC occupies the pivitol position: it knows what the system can bear and it knows what the system needs. Because of this unique position, the REC has become more than a vehicle to implement policy. To a degree, the REC, and through it the local districts, has won a voice in policy formulation.

Demographics of the Seaside REC

We have already noted the physical characteristics of the Seaside service area: 7,000 square miles, 17 local school districts, 127 public school buildings, 61,068 students. This section describes the REC itself, its personnel and facilities, and how it operates to carry out its responsibilities in the Seaside area.

Personnel and Facility

The REC's 21 professional and 11 classified staff operate out of one facility in Penubec County, located more or less in the center of the Seaside area. They are housed in a renovated school building that provides ample space for the many activities that go on there. The labor for the renovation was provided by the LEA based in Williamston and the state paid for materials. Walls were removed and added and ceilings were raised and lowered to convert what was once standard school architecture to what now functions as an instructional media center surrounded by a maze of clerical work areas and staff offices. Rectangular classrooms have been subdivided asymmetrically to create uniquely shaped quarters for REC staff members. It's amazing what plants, carpeting, and paint that is not light green can do for the blandness one expects inside the typical school building--all in all, a charming environment for an even more charming staff.

The media center is the highlight of the tour. Everything revolves around it and it is the first thing one sees upon entering the building. Housed there are the instructional and staff development items that draw about 3,500 Seaside educators to the REC each year. Two librarians wait just inside the door to assist patrons in locating what they have traveled to find. The REC receptionist sits there too. "Department of Public Instruction, Seaside Center," is the greeting one gets when contact is made by phone. After all, the REC is the DPI.

Goverance and Administration of the REC

As an extension of the DPI, all REC staff are employees of the DPI. They are charged with interpreting state level policy and providing technical assistance to the LEAs in the implementation of that policy.

The REC has no formal power over its member districts. The member LEAs are free to take part in the REC's services or to forego any formal involvement. In similar fashion, the LEAs have no formal authority over the REC. Although this is the formal arrangement, one should not envision a stalemate. In fact, quite the opposite is true. The LEAs rarely pass up REC assistance and, moreover, they depend on the REC to communicate their needs and capacities to the DPI as policy is formulated. Much more will be said about the relationship among the DPI, the REC, and the Seaside LEAs as our story progresses. For now, let us review the formal structure for governance; although, as we will see, even the formal structure is informal in practice.

Governance

At the highest levels, authority for the operation of the REC passes from the State Board of Education, through the State Superintendent and his Associate Superintendent to the Director of the REC. At the regional level, an informal governance structure takes the form of the Council of Superintendents. The 17 Seaside superintendents meet monthly with the REC director and his staff for what are characterized as "information-sharing" sessions. At these meetings, discussions center on district needs and state policy requirements and the issues surrounding those requirements for the Seaside districts. In one sense, the LEAs informally control REC activities in that superintendents approve proposed REC activities at the monthly meetings. But here again, proposed activities are rarely disapproved because each has been developed in conjunction with the districts and with an eye for what will and will not work in the Seaside area. Superintendents describe the relationship between the REC and LEAs as a "give and take" process.

The school boards of the Seaside LEAs have very little direct involvement with the REC. They are aware of the REC and its function, but typically leave district interactions with it to the superintendents.

Administration

The REC director is responsible for the day-to-day operation of the agency. He supervises the coordinators and professional staff of each of the REC's 13 program areas (described in the next section). All REC staff are responsible to the director for management purposes. In terms of policy implementation, however, each of the program area coordinators is ultimately responsible to the directors of their respective DPI divisions. For example, the REC's Coordinator of Programs for Exceptional Children reports directly to the REC director on a day-to-day basis, but answers to the State Director of the Division for Exceptional Children concerning the implementation of state level special education policy in the Seaside area. The REC director reports directly to the DPI Associate State Superintendent.

Even though the director has no formal control over the policy decisions that come down to his coordinators from their DPI division heads, one should not assume that he has no voice in policy. In fact, there are many indications that he has an even more central role in education policy in this state. His position on the Superintendent's Executive Council is perhaps the most visible indication of his influence at DPI. Moreover, he has played a key role in the evolution of the REC concept. We will describe his part in their development later in the section, "Evolution of Special Education and the RECs." For now it is important to know that he has always had the state superintendent's ear.

The superintendent relies on the director for input on policy through the Executive Council like he relies on the other directors. But the Seaside director's influence goes beyond this type of input. It is not unusual to see the superintendent out in the Seaside area. And when he's there, one can bet that he wants the director's opinion about some matter. The Seaside director tends to downplay his relationship with the state superintendent, however. He explains that if the superintendent does seek his opinion more often than that of the other REC directors, it is only because he has been around longer than they have. Each of the seven REC directors represents a valuable source of information for the state superintendent; they know their regions.

The Executive Council tends to operate informally. There are no formal votes. Rather, group dynamics and political finesse dominate the scene at Council meetings. For the big issues, the state superintendent will ask the directors to write position papers which address the need for the proposed action and how best to carry it out in their respective regions. They are also asked to give attention to the impact of proposed action on local businesses and on various aspects of schol operation, like transportation.

In making his policy decisions, the superintendent tends to take the middle position, but he is sensitive to not hurting the extremes by his action. The Seaside director often finds himself supporting a minority position on the Council bacause the needs of his region are so unique.

The director's influence works the other way, too. He's "the man," so to speak, in the region. A former principal and superintendent in the region, he knows the area, the people and the schools. Moreover, it would be hard to imagine the Seaside superintendents' reaction to a director who had not been in their shoes, preferably with those shoes standing on Seaside turf.

The director's influence on the Seaside superintendents stems from more than his past history as an administrator and a native of the area. He is their man at the DPI. He represents them and, moreover, they know that the DPI listens to him. When the DPI is considering policy, they check with the REC directors and program area coordinators. But more often than not, the first call goes to the director of the Seaside center.

REC Funding

Unlike other types of regionalized service agencies, the funding mechanism and procedures for the REC are quite simple. This is so because the REC receives very little discretionary money of its own. Since it is an extension of the DPI, most budget line-items are simply extensions of the state-level budget. The REC funding mechanism is independent of LEA funding. The Seaside LEAs do not purchase services, nor is REC revenue tied in any way to LEA budgets.

Salaries for REC staff comprise the bulk of the budget. Operating expenses, travel, materials acquisition, supplies and equipment, reproduction, and overhead make up all but five percent of the remaining budget.

The last five percent of the REC budget is earmarked for staff development activities for REC staff and LEA personnel. Each program area receives its five percent allotment to be used internally or, as is more often the case, to be combined with other program area staff development dollars to provide joint staff development programs. For example, the exceptional children and mathematics education areas might go together to provide workshops on mathematics remediation for exceptional students for several LEAs.

The exceptional children area can request additional monies for staff and other development activities beyond its five percent allotment. If it can justify the request and present a reasonable plan of action, the extra dollars will be added to its allocation by the DPI. These additional funds are drawn from the state's portion of P.L. 94-142 dollars.

Recent Budget Cuts

Perhaps the most significant aspect of the REC's fiscal condition is the budget reduction that occurred during the past summer (1981). As a result of the cuts, the REC lost two full-time positions for the 1981-82 school year. Even more important to our story is the fact that both positions were cut from the exceptional children program area. The REC had no choice in deciding where to cut; the budget reduction at the REC level merely reflected the cuts in the budget of the Division for Exceptional Children at the DPI. Thus, the loss of staff at DPI trickled down to the REC level. When taken together, the cuts at both levels have had a profound effect on the role and services of the REC exceptional children staff. These efforts and the way the REC has dealt with them will be explained in a subsequent section, "REC Exceptional Children Area." Let us first review what the REC does with its money.

Organization and Services

As we have noted, the organization of each REC resembles that of the DPI. The Seaside REC maintains consultants in each of 13 program areas as depicted in Figure 3. Also dipicted in Figure 3 is the flow of administrative authority from the DPI.

The following sections briefly describe the services of 12 of the 13 program areas. The 13th area, special education services provided by the exceptional children program area, is described separately in the next major section.

Adopt-A-School

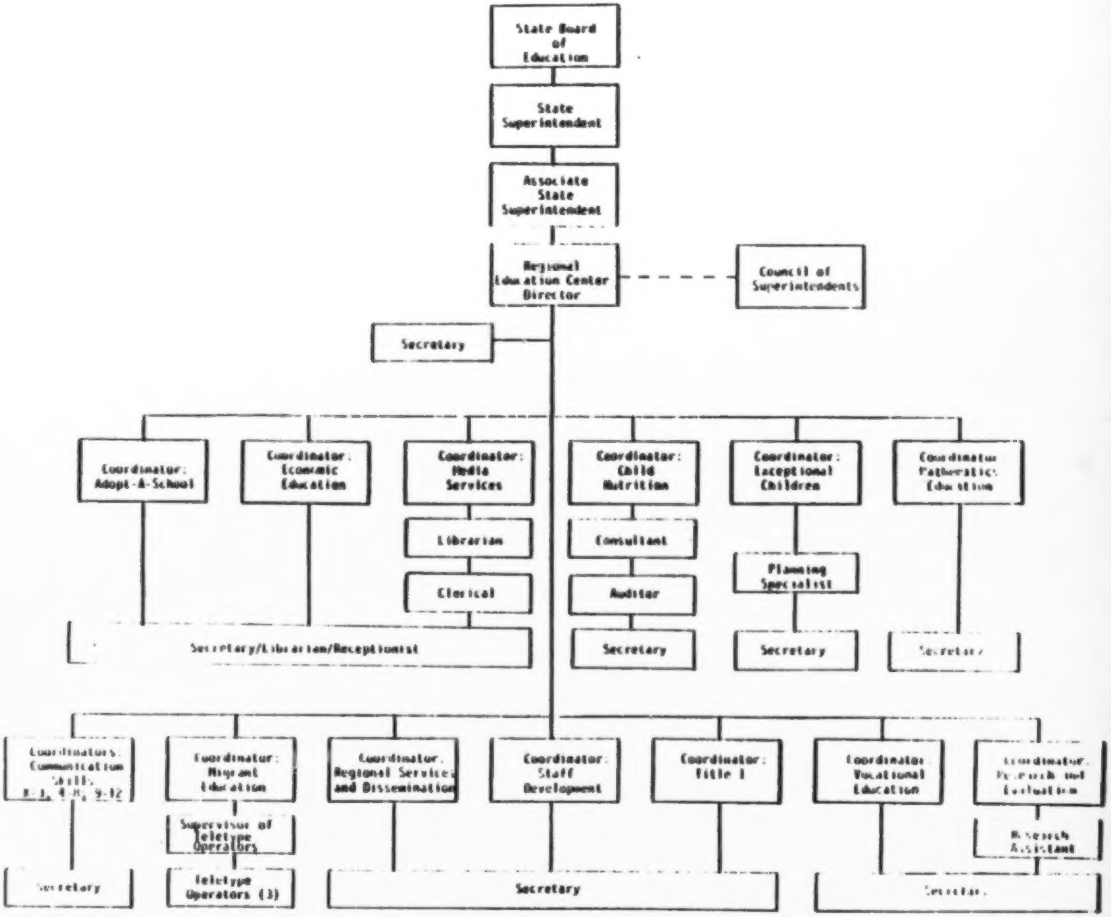
Initiated in 1980, the Adopt-A-School program is designed to mobilize and support the efforts of volunteers who work in the schools to improve the academic skills of youngsters in grades K-12. Each LEA maintains its own volunteer program and the REC coordinator provides technical assistance to them as they implement their programs.

Economic Education

The addition of the economic education program area coincided with the national movement to introduce this content area into the public school curriculum. The REC coordinator gathers and disseminates economic education materials to the Seaside LEAs and provides technical assistance to teachers as they attempt to integrate the content into the general K-12 curriculum. REC services in this area include conducting local needs assessments, long-term planning, and establishing community resource networks in economic education for local school systems.

Figure 3

Seaside REC Organization


State Board of Education
State Superintendent
Associate State Superintendent
Regional Education Center Director
Council of Superintendents
Secretary
Coordinator: Adopt-A-School
Coordinator: Economic Education
Coordinator: Media Services
Librarian
Clerical
Coordinator: Child Nutrition
Consultant
Auditor
Secretary
Coordinator: Exceptional Children
Planning Specialist
Secretary
Coordinator: Mathematics Education
Secretary
Secretary/Librarian/Receptionist
Coordinators: Communication Skills: K-3, 4-8, 9-12
Secretary
Coordinator: Migrant Education
Supervisor of Teletype Operators
Teletype Operators (3)
Coordinator: Regional Services and Dissemination
Coordinator: Staff Development
Coordinator: Title I
Secretary
Coordinator: Vocational Education
Coordinator: Research and Evaluation
Research Assistant
Secretary

BEST COPY AVAILABLE

Media Services

As one might expect, media services is the most tangible resource provided by the REC. Most RECs are noted for their media services and the Seaside REC is certainly no exception; its 50,000-item student and professional library averages about 3,500 loans each year to Seaside teachers. About 600 items are borrowed each month for use in classrooms or in staff development programs. And although most teachers think first of media services when one asks them about the REC, the value of this resource is minimized for some teachers because of their distance from the REC facility. Remember, some teachers would need to travel between 100 and 150 miles to be able to browse through the REC's holdings. Whenever possible, REC staff deliver materials on an informal basis, but there is no formal arrangement, a delivery van, for example, for pick-up and delivery of materials.

Child Nutrition

All public and non-public schools, as well as residential institutions, child care centers, and day care homes in the Seaside catchment area, are eligible for child nutrition services. The child nutrition coordinator and consultant provide assistance in nutrition education and curriculum development as well as in the areas of food service management and quantity food production. The auditor provides fiscal management assistance to any food service program in the Seaside area on request.

Mathematics Education

This program area coordinator provides consultation, technical assistance, and inservice training in both remedial and developmental mathematics instruction. Of late, the area of microcomputer instruction and application has been added to this person's responsibilities with the increased availability of microcomputer hardware in the Seaside schools. Consistent with the national scene, however, the availability of hardware has outrun the availability of appropriate software, which lessens the potential applications of microcomputer technology. Nevertheless, the future looks bright for the Seaside schools in terms of expanding curricular offerings through microcomputer technology.

Communications Skills

Three separate communication skills consultants serve the Seaside primary, intermediate, and secondary schools, respectively. They provide workshops, institutes, and on-site consultation for teachers, aides, and administrators relative to language, listening, writing, reading, and viewing skills as an integral part of the total curriculum.

Migrant Education

The migrant education coordinator and his staff provide a statewide record transfer system and consultation services for the migrant education resource teachers located in several of the Seaside LEAs. A teletype supervisor and three operators man the records transfer system, which has access to the national system. Much more will be said about migrant education services later in the case, particularly how this program interacts with special education.

Regional Services and Dissemination

The coordinator for this program area serves teachers and administrators in identifying and adopting successful educational programs that meet identified LEA needs. If LEAs wish to adopt or adapt a program for local implementation, the services and dissemination coordinator provides technical assistance in design and implementation, as well as in the coordination of any staff development necessary to institute the program. Another major responsibility of the services and dissemination consultant is to coordinate staff development for building principals. In nearly all cases, the coordinator works with the REC's staff development coordinator to arrange inservice training activities.

Staff Development

This REC program area provides consultative and coordination services for LEA and REC staff development activities. The Seaside REC is the only REC in the state to offer such an extensive array of staff development services. Besides providing informal consultation and coordination activities, the staff development coordinator serves as the exeutive officer of the Staff Development Coordinator's Council which assists LEAs in their staff development efforts.

Title I

The area coordinator assists LEAs in preparing program applications for Title I funds and in the implementation of those programs once funds are granted. The coordinator also monitors LEA programs and keeps districts up to date on new directives from Washington and from the state. Along with migrant and special education, Title I programs are a major source of federal dollars in the region. There is considerable coordination among the three areas, which will be discussed in some depth later in the case.

Vocational Education

The coordinator of vocational education services provides technical assistance to LEAs in planning, implementing, and evaluating vocational programs. Services include staff development and fiscal management. Staff development is geared toward upgrading instruction, especially in regard to handicapped students in LEA vocational programs. Often, LEAs provide inservice programs with the assistance of the vocational education program area and two other REC divisions: special education and staff development. Regarding fiscal assistance, the vocational education unit assists LEAs in obtaining the necessary state and federal grants and entitlements to fund their programs. This includes assistance in procuring and using 15 percent of their federal money for disadvantaged students and 10 percent for handicapped students.

Research and Evaluation

The coordinator and her research assistant provide technical assistance to Seaside districts in the coordination of LEA testing and evaluation activities. In addition, the coordinator serves as the regional field supervisor for the statewide testing program, which includes the minimum competency testing program for high school students (grades 11 and 12) and the annual testing program in grades 1, 2, 3, 6, and 9. The latter program serves to evaluate program and curriculum adequacy and to identify students who are not achieving adequately. More will be said about both programs in the section "Grading and Evaluating Students."

School Finance

School finance is the only major area of school operation not represented by the REC program areas. The Seaside LEAs must work directly with the central DPI for this type of assistance. However, in nearly all program areas, and particularly in special education, the REC provides informal fiscal advice: where to find resources and how to stretch local dollars. These services have become increasingly important in recent years as local and state resources have shrunk. Addressing needs beyond its formal role is characteristic of the REC. Agency staff stay on top of local needs and do whatever they can to help.

Exceptional Children Program Area

As noted previously, this school year the RECs were assigned the task of monitoring LEA compliance with P.L. 94-142. We noted, too, that this delegation represented a significant departure from the traditional role of REC staff. But their new role is only part of the change that occurred this year. The REC exceptional children program area lost two of its four staff positions as a result of the same round of budget cuts that gave them the monitoring job. So, not only do they have added work, they are reduced in number by one half. Furthermore, one of the two remaining staff members is precluded from conducting monitoring activities because her position is funded with P.L. 94-142 monies and, as such, monitoring for her would represent a conflict of interest by federal definition. Complicating matters further is the fact that the REC staff development coordinator position is slated to be eliminated at the end of the 1981-82 school year. Thus, more work related to the coordination of staff development in the Seaside LEAs will revert to the exceptional children staff.

The net effect of the current reduction in human resources and the role change has been to reduce REC technical assistance to Seaside LEAs. Even so, the net loss has not been quite as great as one might expect. In part, this is the result of extra effort on the part of the remaining staff. They simply have taken on more work. What is more interesting for the purposes of this case study, however, is the way that the merger of technical assistance and monitoring has worked out. Let us continue with the description of the work done this year; the way the merger of these two seemingly disparate tasks has evolved should become apparent to the reader.

General Service Role

By and large, REC special education staff work with adults; the only children they deal with are those that are involved in demonstration teaching. Their general aim is to provide and facilitate LEA staff and program development efforts. Beyond this basic guiding principle, the special education staff work on a request basis. Their second principle: "don't barge in--wait to be asked." Of course, a forte of theirs is helping LEAs identify their needs.

Once a need has been identified, the staff shift into action using one of two vehicles: (1) respond themselves, at times in conjunction with other REC staff, and (2) arrange some type of collaborative effort among LEAs or LEAs and other agencies or individuals. With the recent staff reduction, however, much less of the first type of assistance occurs.

A primary role of the REC in general and of the special education staff in particular is facilitating collaboration among agencies and/ or individuals. Even here, the REC posture is an informal one. Suggestions are made and, if they are accepted, people are brought together. Through their many contacts with the Department of Human Resources (DHR), the primary source of related services in the area, they know many of the staff personally. This helps a great deal, although the coordinator describes her attempts at making these arrangements as only moderately successful.

Another way to look at the services provided is in terms of whether they respond to the needs of teachers or administrators. Before the staff reduction and addition of monitoring responsibilities, more emphasis was given to teachers' needs. Since then, however, teachers have received less attention. On one hand, LEA budgets have become tighter this year as well. Thus, more time is spent helping administrators stretch their dollars. On the other hand, because the REC staff are now the monitors, they have become a ready source of information on compliance. In effect, the emphasis now is helping LEAs "stay legal and get the most for the dollar."

The compliance aspect of this arrangement has worked well from an administrative perspective. Local administrators find it useful to seek compliance assistance before the fact, "to find out what's legal," as one local administrator put it. Administrators' questions tend not to relate to the big issues or features of the law. Rather, they most often are about the "picky" things. For example, a child is not allowed to ride the special van for several days because of misbehavior. Is that legal in view of the guidelines on appropriate transportation?

Local administrators couldn't be happier with the new monitoring arrangement; they get compliance advice prior to taking action and the actual monitoring visits tend to be more productive when they occur. But local teachers tend to get less of what they need. What little time is left after actual compliance visits are arranged and conducted is eaten up by compliance queries which are not always easy to answer, even if they are picky. If the REC can't respond, they check with DPI until they can.

A look at the changing emphasis of REC special education services over the past 8 years illustrates the point. From 1974 to 1977 the REC implemented a collaborative plan developed with area teacher training programs to certify all area teachers of educable mentally handicapped (EMH) children. In 1978 they began staff development programs for Seaside teachers in response to P.L. 94-142 and the state's own special education law. Maintaining this effort as their major thrust, they took on the task of arranging for programs to certify teachers of gifted and talented students. They have put a tremendous amount of effort into the development of LEA teachers and programs. In 1981-82, the two remaining staff find themselves working harder than ever--one doing monitoring, the other taking on more jobs inside and outside of the REC--and, all the while, watching their goals for teachers become "past tense."

They haven't given up, however. They admit that they've been hurt, but they say that when monitoring is done, they'll get back to "LEA development." The REC director is somewhat less optimistic. He feels very good about where they've come with special education, but given the current budget situation, he's not sure about where they're going.

EVOLUTION OF PUBLIC EDUCATION

This section tells three stories. Each story traces a different aspect of the development of public education in the state. Primarily, however, the stories concentrate on development in the Seaside region. The first story is about education in general and begins by noting the impact the interaction of geography and politics has had on the region. It goes on to follow development of the school system over time, including school district reorganization.

The second and third stories, the evolution of the REC concept and special education, are told together and cover a much shorter period of time. The stories are really one because the development of each has heavily influenced the other.

Development of the Seaside Public Schools

We have already noted the diversity of the Seaside region. It is most diverse in its peoole and the distribution of wealth. As one travels among the counties, it is hard to imagine that these differences can exist in such close proximity. Yet, when one studies the geography, history and politics of the region, some sense can be made of the current state of affairs.

The flat, coastal plains of the Seaside region interact with the area's historical/political context in two major ways to have a profound impact on the development of its people and the evolution of its public schools. First, unlike other parts of the state that tend to be mountainous, the Seaside region was ideal for large plantations and the introduction of slavery. Politically, this area has been dominated since the late 1600's by a "landed gentry." Moreover, their dominance has only begun to diminish over the last 10 years as machine politics have lost ground because of increases in the number of black voters and changes in the population characteristics through in-migration.

A second impact of geography on social development occurred in the second half of the 19th century when the culture that had taken root in other coastal areas skipped over this area because the marshy land would not support road beds for the railroad. Even though the agricultural capacity of the land continued to expand during this time, the standard of living for the area's former slaves rose only slightly as the region continued to stagnate politically and socially. The rich got richer . . .

During this same period, the state legislature enacted the first statewide appropriations bill for public education. Between 1890 and 1920, a series of laws provided more and more state money and extended the school term to six months. By 1920, the state funded the elementary and secondary schools of every district by allocating state sales tax dollars to supplement local property tax revenues. An important feature of this and all subsequent school finance legislation, however, is that no specified "local tax effort" is required. The idea of a required local tax effort is a basic feature of virtually all state funding formulas. A complete explanation of the requirement and how it has affected school finance in this state will be provided in the section, "School Finance." For now, it is important to know that without the required effort stipulation, local communities are free to tax themselves for public education at their own discretion.

During the late 1800's and into the early 1900's, the landed gentry of the Seaside region sent their children to private schools or provided tutors for them at home. Because they controlled local politics and, thus, levied property taxes, and because their children did not attend public schools, there was little incentive for them to tax themselves to support public education. So, while public education steadily improved in the rest of the country as a result of increased financial support from state and local governments, the schools in the Seaside area continued to lose ground. This is not to say, however, that all of the schools in the region were neglected. Quite the contrary. Many communities were committed to quality public schools and taxed themselves accordingly. The determinants were who attended the schools and who levied the taxes. In general, however, public schools were slow to develop in the area because they did not have the support of the ruling landed gentry.

By 1900, several hundred school districts had emerged across the state. In those days, each school was equivalent to one school district. In the 1930's, another law enacted by the legislature abolished all school districts, set minimum standards for number of students and curricular offerings, and permitted districts that could meet these standards to reorganize. As a result, the number of districts was reduced to 250.

Dring World War II, some of the reconstituted districts folded; by the early 1950's mergers among city districts and their suburban counterparts had taken place. These mergers resulted in the formation of county districts, in which all districts in one county would join together to form one school system. In some cases, all but one district (usually the largest) would consolidate, creating a county system encircling an isolated city district. This trend toward a county system continued through the 1960's and into the 1970's until the 250 districts were reduced to 145 by the 1976-77 school year. Two more consolidations occurred between 1980 and the current school year and several sets of districts continue to consider mergers. The reconfiguration of school organization over this 50-year period has resulted in 80 single county units out of a total of 100 counties in the state. In the remaining 20 counties, county systems coexist with one or more city systems.

Although across the state several mergers are pending between city and county units, the tables have turned relative to the motivation to consolidate. During the 1960's and 1970's, county units were anxious to join city districts, but the city units were reluctant to receive them. Now, as a result of urban flight and financial troubles, city units are more likely to seek consolidation with the county. However, county districts are more reluctant during the 1980's for fear of losing their tax base to the cities.

One tends to hear the common criticism of consolidation in the Seaside region: "loss of identity." One school board member added a slightly different wrinkle when he said, "It's a matter of having your own thing versus sharing with someone else, and worse still is sharing someplace else." On the subject of school consolidation, one high-ranking DPI official who favors the county system was quick to add, "Don't do it unless people want it." The director of the Seaside REC was a key player in the consolidation movement in the 1950's and 1960's, advocating consolidation. His current position, altered by his extensive reading of the rural education literature, is that the best thing about consolidation in this state is that, "For better or worse, we are done."

The last consolidation completed in the Seaside service area took 12 years to complete. The respective school boards officially agreed to the merger in 1968; the secondary schools were finally consolidated last year. The closing of one of the high schools was the toughest part for the locals to swallow, particularly for the older residents.

There are at least two sides to the story of this merger. Some believe that the closings were delayed to allow resentment to die down before final action. Others believe that the consolidation would have been consumated sooner had the courts not invoked a school integration order in the midst of the merger.

Most of the consolidation in the state occurred at the same time schools were being racially integrated. In fact, many counties accomplished racial integration through school consolidation efforts. As it happened, school desegregation played an important part in the development of the public schools of the Seaside region.

Currently, private schools that admit only white children are not a factor in the Seaside region; 15 years ago they were. As the quality of public schools increased over the past 15 years, more white families removed their children from private schools and returned them to public schools. Although some parents continued to use private schools, the fact that fewer children attended them has caused most of them to fail. There is only one left in the region. In this county, where the private school is "alive and well, " it is more difficult for the public school system to get local money from the county commissioners (the local elected officials who levy taxes and allocate the resources to all social service agencies, including the public schools), a situation which is very similar to earlier periods when the landed gentry neglected the public schools because their children didn't attend them. Thus, a third setback to the Seaside schools occurred during school desegregation when private schools emerged to serve children who had been removed from the public schools.

The incentive to support the public schools was removed during racial desegregation when private schools emerged in the area. This is not surprising. What is surprising, however, is the way the Seaside public schools have bounced back. Over the past 15 years, the public schools have managed to improve student performance scores enough to recapture students from the private schools. Enough students returned virtually to eliminate the private school market. As the number of private schools declined, the local incentive for more resources to be allocated to public education was reinstated.

How did the Seaside public schools put the private schools out of business? Much of the credit has to be given to the local educators. Working under what any reasonable person would call incredible odds, they made the best of a bad situation: disadvantaged student populations, inadequate revenues, an inadequate supply of qualified staff, and more than their share of handicapped students. And, as we will see as our story continues, we will see that no small share of the credit rightfully goes to the Seaside REC.

Evolution of Special Education and the RECs

The stories of the development of the REC concept and the evolution of special education services are short ones. Both stories took place over approximately the same 10-year period, although, unlike the RECs, handicapped students have been around much longer.

Prior to 1970, there were no state requirements regarding the education of handicapped children. Who were served, how they were served and, indeed, whether they were served was a matter of local discretion. Most mildly handicapped students, who were nearly always considered to be educable mentally handicapped (EMH), remained in regular classes. An area teacher for 18 of those years characterized the regular teacher's lament as, "I'll get to him tomorrow." Even when some districts started special classes for EMH students, their teachers tended to be "artsy-craftsy types" and the EMH programs soon came to be viewed as a "dumping ground" by other teachers and as the "dumb" class by the other students.

More seriously handicapped students rarely made it to school. Area physicians routinely recommended institutional placements for these children; parents who didn't know of their availability, couldn't afford them, or simply couldn't bear to send their children away to them, simply kept them at home. Trainable mentally handicapped younsters, like their more severely retarded peers, went away or stayed at home. Public school was not an option. And all too often, EHM students wound up in these same places.

In 1968, a study team commissioned by the governor to study the public school system recommended that the DPI could be made more responsive to state needs if the agency itself were decentralized. The current state superintendent was a member of the study team; he ran for office that same year on a decentralized ticket and won. Both he and the RECs are still here.

Soon after he took office, the state superintendent called together six superintendents to plan the actualization of the REC concept. The current director of the Seaside REC was one of those superintendents. As the team began its deliberations, they looked for guidance--some model or past experience from which they could learn more about the nature of regionalized service agencies. The state's only prior experience in such matters had been with the Special Education Instructional Materials Centers (IMCs). Federal funds had been obtained some years before to establish three IMCs. The current RECs became expansions of the old IMC model. The current state director of the Exceptional Children Division headed these centers. Soon after, when they were disbanded as federal monies dried up, he was transferred to his present post.

Title IV-C monies were used to fund the first two RECs, one of which was placed in the Seaside area. They were staffed with only a regional director and a secretary: the hope was to establish two centers as placeholders while working to expand them as well as to establish the remaining five. The current director became the Seaside REC's first director when it opened in July of 1972.

As director of the IMC's, the current state director of special education was in the best position to know the special education needs of the state. He proposed that each REC be staffed with four special education positions: coordinator, staff development specialist, instructional resource specialist, and planning specialist. His proposal was accepted and eventually he secured state funds for the staff development position and federal VI-B dollars to fund the other three positions at each REC as well as to begin to build his DPI-based special education staff. Eventually the REC planning team followed suit and defined a staffing pattern for each REC which included at least one position from each of the major DPI program areas. It took five years to secure complete funding, but by July 1977 all seven RECs were up and running.

Just before the first two RECs opened for business in 1972, the state began to address the issue of special education programming by allocating categorical funds to districts which wanted to start special education programs at the local level. The funds were used as an incentive to create specific categorical services. One by one, programs for each category of exceptionality were identified as state goals; money was given to any district that would establish a program for that particular category of children. The sequence over the first few years was first to fund EMH and then TMH programs. Programs for learning disabled (LD) children and gifted and talented youngsters were next followed by programs for emotionally handicapped (EH) students. None of these programs was mandated. Rather, the availability of resources was used as an incentive for local districts to act. Eventually, when P.L. 94-142 and the state's own special education law mandated programs for all types of exceptionality, categorical incentive funding was dropped.

About two years after the opening of the first two RECs in 1974, special education in the state was handed a windfall in the form of the Regional Training Centers (RTCs). The RTCs were to serve as demonstration and training centers to prepare regular teachers to work with LD students. Each of four RTCs was eventually equipped with master teachers, demonstration classrooms, and a series of self-instructional modules on relevant topics for teachers. This was certainly an interesting arrangement; but even more interesting is the story behind the evolution of the RTC network.

Prior to the initiation of categorical incentive funds for LD programs, several parents of LD children in one district approached their state legislator for help. Their LD children were not receiving services and they wanted him to do something about it. The legislator approached the state director of special education and, in short order, the two of them struck a bargain. The director allocated $30,000 to start an LD program in the local district. In turn, the legislator agreed to see a bill through the General Assembly that would create and fund the RTCs. The director seized the opportunity to institute what he believed to be the most pressing need at the time--training for regular teachers. His goal was to work on attitudes as well as instructional and management skills. The intent was to better prepare regular teachers to work with LD students and to reduce the number of students needing LD services by increasing regular teachers' skills in accommodating individual differences.

Things were starting to happen in special education. This story illustrates how quickly they can happen. But the story did not end here; windfalls can be lost as quickly as they are gained. We will follow the story of the RTCs to its conclusion as we continue with the evolution of special education services. For now, it is important to understand that this story is just one example of the influence that was brought to bear in the state by parents on behalf of their children. And at about this same time, parents in this and other states were applying the same type of influence at the national level. The result--P.L. 94-142.

Soon after the passage of P.L. 94-142 in 1975, the Powell Bill, this state's own version of the special education mandate, was passed by the General Assembly. For all intents and purposes, it mirrored P.L. 94-142. The only difference was the inclusion of programs for gifted and talented students within the definition of special education. The state chose not to mandate services from birth to 5 or grom 18 to 21. Rather, it left the provision of special education services for these age groups to local discretion on a permissive basis. In effect, services are mandated between the ages of 5 and 17. However, some districts have applied for and received P.L. 94-142 VI-B money to provide programs for handicapped students in the 18-21 age range. For example, many TMH students are served until they are 21 years old, either in LEA programs or in one the two sheltered workshops which serve the Seaside region.

By 1977-78, most systems were in place. P.L. 94-142 had been passed and federal dollars would soon arrive, the Powell Bill spelled out the roles and responsibilities of state agencies in the education of exceptional children, the RECs had been established and special education technical assistance was now available on a regional basis, and the RTCs were there to address the needs of regular teachers. The future looked bright. In fewer than 10 years, special education had progressed at an incredible rate. Administratively at least, special education had come out of the dark ages. Now the real work--implementation--could begin.

The role of the REC special education staff was to interpret state special education policy and to provide the technical assistance necessary for the locals to comply with it. One of the RTCs was located within the Seaside region, making it easier for the REC staff in terms of addressing the needs of regular teachers. But as we know, the REC's special education staffing pattern and role did not last very long. And neither did the RTCs.

During the summer of 1981, major funding reductions in the DPI Division for Exceptional Children created a ripple effect that was to change the state's special education operation significantly. The losses meant the disbanding of the RTCs, the reduction in REC special education staff by one half, and the transfer of the P.L. 94-142 monitoring role to the RECs. It appeared that, in one day, special education had lost much of what it had gained over the previous 10 years. And although the REC's new monitoring role appears to have worked out well administratively, it has caused effort to be shifted away from what is perhaps the most important work to be done--local staff and program development.

SCHOOL FINANCE

In this state, as in other states, public education is a state function subject to legislative control. However, the responsibility of financing public education is vested in state government, as opposed to local districts, to a larger extent than in most states. On the average, state funds account for 64 percent of local district budgets.

General Education Funding

The state funding mechanism cannot be categorized neatly. It is a combination of a pupil unit, teacher unit and personnel budget approach. The primary unit of measurement is average daily membership (ADM) of pupils from which most allotments are calculated. The base allotment for the formula is the teacher position, which is calculated on the basis of ADM. The actual rate of students per teacher varies according to grade level. Once the number of teachers for a particular district is calculated, the state reimburses the district at 100 percent of the cost of teacher salaries according to a standard statewide salary schedule. School districts employing teachers with more experience and training will receive more money per pupil than districts who hire teachers with less training and experience.

In addition to teaching positions, the state formula allocates other positions to districts for superintendents, supervisors, principals, and clerks. One superintendent and one supervisor position are allocated to each LEA. One principal is allocated for each building of a specified number of students and teachers. The number of clerks is derived on the basis of total ADM. In all, 63 separate line-item allotments are used to distribute funds to local districts, each with its own independent criteria. These allotments include the personnel listed above; other personnel such as aides, counselors, and librarians; some categorical program areas like kindergarten, physical education, and drivers' training; overhead costs; and equipment and materials.

Although the state makes a major commitment to funding the education enterprise in terms of the proportion of total education costs it pays, average per pupil expenditures run at about three-fourths of the national average. This state's average per pupil cost figure is also below that of its three neighboring states. Moreover, there has been a tendency for the state's fiscal role in education to diminish as pressures for other governmental services mount.

Average Daily Membership/Personnel Allotment

A district's allotment of state funds for one school year is based on the count of students for the three best of the first four months of the previous school year; most professional positions are allotted on the basis of the ADM count. ADM allotments of teaching personnel are based on grade level. In kindergarten, funds for one teacher are provided for every 29 students. In the elementary grades, one teacher is allotted for every 30 students, while districts need 31 students for each secondary teacher position. Teacher aides are provided for each classroom in grades kindergarten through three at the rate of one aide for every 29 students. Other instructional personnel, counselors and librarians, for example, are allotted on the basis of one for every 264 students. A minimum of six vocational teachers is provided for each district, regardless of size. One principal position is provided for each school building with 100 or more students and/or 7 or more teachers. School psychologists are not included as allowable positions under the basic aid program.

Funds for special education teachers and support/related service personnel are provided under a separate funding formula, which is presented in the next section, "Special Education Funding."

Once the number of professional positions has been calculated, districts are allotted the the full salary and overhead costs for each position according to the statewide salary schedule. Like most salary schedules, this one rewards experience and training level. In 1981-82, it ranged from $10,450 for a first year teacher with a bachelor's degree to $20,610 for a teacher with full certification and 16 years experience. Districts are free, however, to increase salaries beyond the designated level. And many wealthier districts do sweeten the pot to attract the most qualified teachers. Supplemental increments of this type can range as high as $1,000.

Personnel positions and a number of other nonprogrammatic line-item allocations are made on the basis of ADM. Virtually every position, piece of equipment, and material is allocated to districts on the basis of ADM. All in all, 63 line-item calculations must be made to determine the exact configuration of the state's contribution to a district in all of these areas.

Ordinarily, the state funds districts on a biannual basis. However, because of a tight state budget and because lately there has been less certainty about funding, the state has reverted to single-year funding.

In an attempt to account for fluctuations in student enrollment, the funding formula includes an adjustment procedure. In any given school year, a district can change its ADM prediction based on the actual number of students that enroll within the first 10 school days. If the difference between last year's prediction and this year's actual count is enough to justify an additional teaching position, the state will adjust the state aid allotment to cover the district's costs of hiring a teacher.

The state pays all district transportation costs, including bus maintenance. Further, after a district buys a bus, the state will replace it when a new one is needed and turn the title over to the district. From a fiscal perspective, transportation presents few problems for districts.

Total Education Budget

Beyond the dollars that come from the state, local districts tax themselves to generate revenues to support the remaining portion of their total operating costs. Because there is no requirement in the funding guidelines that sets a standard level of local contribution, the amount of local dollars used to support public education varies from 0 to 50 percent with about half of the state's districts paying no percentage of local costs. Current state averages for the mix of state, local and federal dollars are 67 percent state, 20 percent local and 13 percent federal. Local revenues, if any, are generated from local property taxes, which are based on locally set tax levies and property valuations.

Figure 4 illustrates the mix of state and local dollars used to fund public schools. The "state basic program" represents the money that comes from the state according to the ADM calculations discussed in the preceding section. The amount of state dollars per instructional unit (the classroom and the resources necessary to support it) is nearly equal across districts, since the bulk of the resources necessary to sustain a classroom (over 80 percent) goes toward the teacher's salary which is relatively constant across LEAs.

The top part of Figure 4 depicts local tax contribution. It is here that resources begin to vary widely from poor to wealthy districts. To a considerable degree, the quality of a student's educational program under this type of a system depends on where the student lives. This artifact of the funding formula has been criticized for quite some time. Measures have been proposed to account for the concerns raised and they will be review in "Finance Reform," at the end of this section.

Special Education Funding

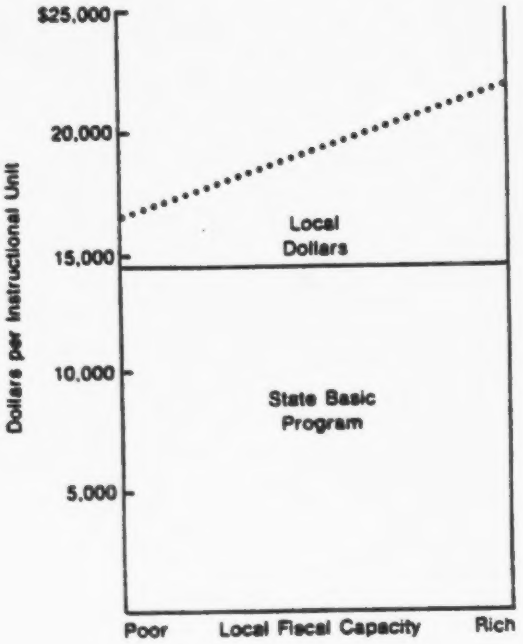
Funds to support programs for exceptional children at the local level are generated in two ways. First, exceptional children are counted in the district's ADM calculation. The resources used by programs for exceptional children for school-based and central administration costs (except for the local director of programs for exceptional position--explained below), non-special education clerical support, plant operation, textbooks, supplies, and the rest of the 63 line-item allocations are thus generated in the usual manner and are expected to be paid for from the regular allotment. In this respect, exceptional children generate state money in the same way as regular students. In calculating the allotment for teaching positions, however, only exceptional children who spend most of the day in regular classrooms (mainstreamed) are counted in the ADM figure. Children who are served in self-contained classrooms are not figured in the ADM count when it is used to generate teaching positions. Children who are placed in self-contained classrooms who spend some portion of the school day in regular programs are counted in the ADM figure on the basis of the proportion of the school day that they spend in the regular program.

These funds can be considered "regular education" dollars. They are meant to cover the regular education portion of the total cost of educating an exceptional child. The second way exceptional children generate state funds is through "add-on" allocations. As the name suggests, "add-on" funds are intended to cover the additional costs, beyond the regular education costs, of educating the exceptional child.

The number of exceptional children for whom the state will provide add-on funds is determined on the basis of national "expectancy norms."

Figure 4

Present Funding Model



The state sets these norms at a rate which is 30 percent higher than current national incidence figures for each area of exceptionality. The state expectancy norms for 1981-82 are listed below.

Exceptionality Handicapped	Expectancy Norms (%)
Mentally Handicapped	3.00
Specific Learning Disability	3.90
Seriously Emotionally Handicapped	2.60
Speech/Language Impaired	4.55
Other Handicapped	2.20
Autistic	
Hearing Impaired	
Multihandicapped	
Other Health Impaired	
Visually Impaired	
Gifted and Talented	3.90

Allocations of funds for each school year are based on the number of eligible students in each district the previous year. Counts are taken on October 1 and December 1. The total number of eligible handicapped children for allocation purposes cannot exceed 12.5 percent of the total school-age population. Gifted and talented children cannot exceed 3.9 percent. Once the number of handicapped and gifted and talented students is calculated, a weighted factor is applied to the state average cost per pupil figure to determine the total add-on allocation. Handicapped children's add-on factor is 0.75 or 75 percent of the average cost per pupil. The weight for gifted and talented children is 25 percent of the cost per pupil figure. In 1981-82, districts received $885 in add-on funds for each handicapped student under the expectancy-norm figure. They received $295 for each gifted and talented student under the 3.9 percent limit. Both add-on amounts are based on the 1981-82 state average cost per pupil of $1,180 for regular education students (state dollars only).

The funding scheme has a "hold harmless" provision which assures that no district receives less add-on revenues than it did during the 1979-80 school year.

Funds generated on the basis of exceptional children add-on dollars can be spent in a number of different ways including: position of local director of exceptional children programs (0-23,999 ADM = 1.0; 24,000 ADM and above = 2.0); clerical assistance; teachers; speech, language, and hearing specialists; physical and occupational therapists; audiologists; aides; psychologists; contracted services; special materials and equipment; diagnostic and evaluation services; travel for itinerants; staff development, including training for regular educators; training for parents; microcomputers; homebound/hospital instruction; and costs for placements in programs not operated by the local district.

P.L. 94-142 Funds.

The state received approximately $25 million in P.L. 94-142 funds for the 1981-82 school year. Over 90 percent of this amount is passed on to local districts according to number of handicapped students. The state's contribution to programs for exceptional children for 1981-82 is $115 million. The federal contribution represents 18 percent of the total 1981-82 expenditure of $140 million for special education. There are no figures available for local contributions to exceptional programs, but in proportion to state and federal amounts local contributions in the Seaside area are very small.

The state's portion of the federal allocation (10 percent) is used to support state level administrative costs and to fund several statewide projects. Almost half of the dollars are used to support special education activities and staff assigned to the RECs. The DPI holds 5 percent of the state allocation to support requests from the RECs for special education staff development activities. The remaining 90 percent of the P.L. 94-142 funds is used by the LEAs to provide programs and services for exceptional children at the local level. Local districts receive their allotment after submitting a proposal to the state which complies with the requirements for such plans specified in the regulations accompanying P.L. 94-142 and the special education rules that are attached to the state special education law. Each district submits a separate application. All districts in the state have enough handicapped students to meet the $7,500 minimum required for individual LEA applications.

The LEAs use their federal allocations to supplement local program needs. A small number enter into cooperative endeavors with other LEAs or agencies to serve low-incidence populations, some hire more teachers and aides, some hire psychologists. Regardless of how districts plan to use their federal money, however, the state strongly urges that 5 percent be used for staff development activities related to P.L. 94-142 priorities.

School Finance Reform

School finance has been the subject of considerable debate in this state for the last 50 years. No fewer than nine statewide and special topic studies have been commissioned by governors and various state agencies since 1927. Although conditions have varied across the time during which the studies were conducted, three conclusions have been reached. A minimum foundation or base program is needed in order to provide equal opportunity for children in the state. Tax effort should be equalized in some manner so that taxes are equitably distributed. School districts should be allowed to exceed the minimum foundation or base program for their districts.

The last of these recommendations does, in fact, exist currently. The first two recommendations, however, have been an on-going source of controversy among those who believe that the current system does not sufficiently relieve inequity in school programs and the children they serve. The last and most comprehensive study of school finance emphasized inequity and made a series of recommendations to correct it. The commission's report related the general findings to three primary conclusions. First, it pointed out that the goal of equal educational opportunity could not be reached if it were not recognized that school districts with excessive ratios of children with unusual educational deficiencies suffer a substantial fiscal burden in meeting those needs. It went on to criticize the current funding scheme for not being sensitive to both needs and costs. Second, it showed how the educational curriculum in public schools in this state is affected by sparcity and local fiscal inadequacy. Substantial differences among districts were identified in the areas of cultural arts, foreign languages, certain elementary programs, and programs for certain types of exceptional children. Third, it demonstrated that the most experienced teachers with the highest levels of training tend to be found in the most affluent and populous districts.

The commission made several recommendations that have a bearing on special education, rural education, and the local capacity and effort of school districts.

Equalization Fund. This recommendation directly addressed local capacity and unusual local need. It urged the state to create an "equalization fund" that would be used to supplement LEAs that are unable to provide adequate programs because of fiscal incapacity to meet the needs of the children they serve. Money from the fund would be distributed to districts on the basis of the fiscal capacity of the county unit.

Local Effort. Recognizing the effects of local discretionary taxation on the quality of public education, the commission recommended a required level of local taxation. Each district would be obliged to tax itself in support of public education. To these local resources would be added the equalization fund, with the poorest districts receiving commensurately more funds so as to guarantee a minimum level of resources for local effort. Figure 5 illustrates the current funding system and the model proposed, which includes the required effort and equalization fund features.

Programmatic Funding. The commission recommended that the current line-item allocation system be abolished because it does not respond adequately to educational needs or program costs. Instead, they recommended a pupil-centered system that provides funds based on program costs.

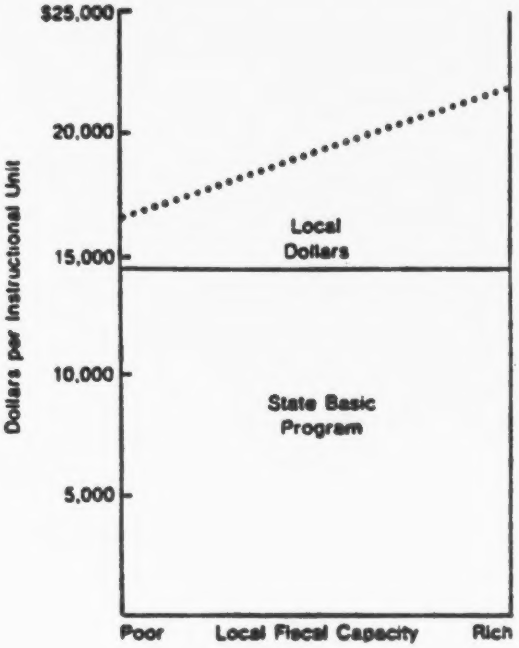
Weighted Instructional Unit. The commission proposed a pupil-oriented system that recognized program cost differences. Variations in program costs were based on both grade level and program type, with the added costs of exceptional children and vocational programs recognized. Table 4 illustrates this idea.

Quality Staff. It was recognized that imbalances existed in the distribution of quality staff across districts. The commission proposed an experience/training factor to be built into the state aid program that would create parity in the quality of the teaching force by providing resources to correct current imbalances which have resulted from fiscal incapacity or other measurable economic circumstances.

Isolated Schools. Districts which could be classified as densely or somewhat densely populated were found to have an advantage over more sparsely populated districts in terms of quality staff and equivalent services. The commission recommended building an isolated school factor

Figure 5

Present Funding Model



Recommended Funding Model with
Equalization Fund and Required Local Effort

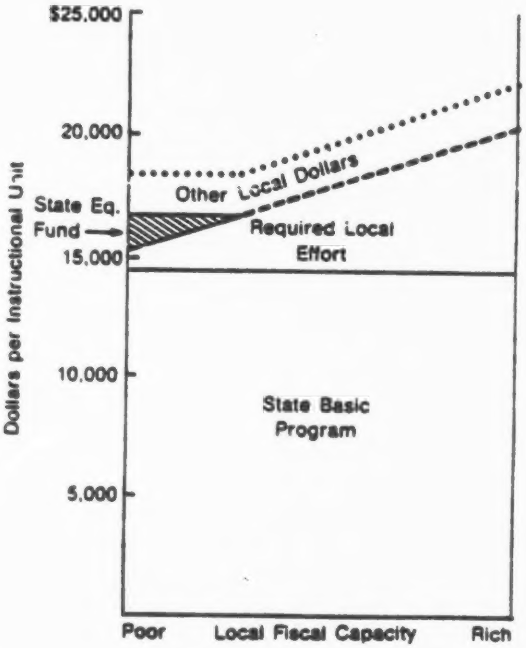


Table 4

Proposed Weighted Instructional Unit System

Example of Calculation of Weighted Instructional Units

(ADM + 27) x Weighted Factor = Weighted Instructional Unit

ADM = average daily membership
27 = number of pupils in classroom unit
Weighted Factor = a weight given to each factor (factors include exceptional children, vocational education, teaching staff index, isolated school)

Basic Program Units	**Weighted Instructional Unit**
Grades K - 3	1.23
Grades 4 - 8 (Base Program)	1.00
Grades 9 - 12	1.23
"Add-On" Exceptional Child Units	
Level I	5.40
Trainable Mentally Retarded	
Visually Handicapped	
Level II	2.70
Emotionally Handicapped	
Physically Handicapped	
Hearing Impaired, Hospitalized/Homebound	
Level III	1.35
Educable Mentally Retarded	
Learning Disabled	
Level IV	0.45
Speech Impaired	
Level V	0.05
Gifted and Talented	
"Add-On" Vocational Units	
Agriculture	0.30
Distributive	0.27
Health	0.36
Home Economics	0.28
Business Office	0.30
Technical	0.32
Trade and Industrial	0.32

into the basic aid program that would provide a fiscal adjustment for districts which must maintain an essential but isolated school.

Taxpayer Equity. The commission recognized the need to redress the regressive nature of the current property tax basis for generating local school revenues. Inequities among counties in terms of property valuations was identified as a major part of the problem. Commission members recommended a sales-assessment ratio mechanism for certifying valuations that would remove local discretion for setting valuation levels.

Although the findings of this and other finance studies have identified the problems with the current funding system and recommended what appear to be reasonable solutions, no action has been taken to minimize current inequities. Several state and regional respondents who have dealt with these issues over the years identified three explanations. Some school officials question the priorities of the legislature. One example that was offered was that, concurrent with the most recent cuts in the state education budget that eliminated the RTCs and the state's capacity to monitor P.L. 94-142, the legislature allocated considerable resources to support an aspect of the show horse trade. Another explanation of the legislature's failure to act on finance reform was that the current recession has created a kind of "shrinking dollar paranoia" within the legislature. Many believe that we are about to "re-live the 30's all over again," and, thus, they have become even more fiscally conservative. A final explanation suggests that a reformulation of the finance system that involves weighting factors and other types of differentials is too complex for the legislature. They naturally resist any plan that does not distribute resources on a "dollar for dollar equity" basis. They won't go beyond a simple numerical equity issue; they reject fiscal decisions that require "judgments" to be made.

Some concessions have been won, however. For example, rural school administrators convinced the legislature to allot principals on a building basis regardless of district size. In the Seaside region, a funding supplement for an isolated, island school was granted after an appeal to the legislature. In both cases, however, the concessions were won by approaching the legislature with an "emotional appeal" rather than solid cost data.

LOCAL EDUCATION AGENCIES

The organization of the Seaside LEAs is not different from that which one would find in most school districts. Each has a superintendent, and depending on its size, may have an assistant superintendent and some district-level curriculum consultants. Each school has a principal, thanks to the appeal made to the state legislature by rural administrators. Each district is allotted one supervisory position, and some districts add one or two supervisors from local tax dollars. A local director of special education, the newest position in the LEA administrative hierarchy, will be discussed in a later section ("LEA Special Education"). Coordinators for Title I and migrant education programs round out the LEA's organizational chart, although in most Seaside LEAs, one person wears both of these hats. In fact, it is sometimes the case that this person will also wear the local director of special education hat as well.

Governance

Local school board members are elected and serve four-year terms, although not long ago board members were appointed. Local board members tend to be the most educated citizens available. Physicians, dentists, and other professionals and retired educators are not uncommon in wealthier counties and larger towns.

The role of school boards center on four primary tasks. They hire the superintendent; approve the district budget (although the county commissioners have the ultimate authority as to what gets funded); oversee and approve the budget once it is funded; and, as one board member put it, they try to "compliment curricula that are pertinent and filter out the trash." Things that are farther away from direct student services are more likely to get shot down.

Board members rely heavily on the superintendent's expertise in educational matters. This should not be read as "rubber stamp," however. The board must be convinced; they will not follow the superintendent blindly.

The local school board is one of two political entities in the Seaside counties, the other being the county commission. And although some gauge the relationship of the school board and of the county commissioners as "a political balance," the commissioners' taxing authority translates into more local power. Some board members feel that more control over the budget process in their hands would allow them to "decide what's best and then fund it." The way it stands, planning for what is best and funding it are two separate processes.

LEA Funding

Calculating and getting the resources necessary to run a school district is no simple matter. There are state dollars, local dollars, federal dollars--each with its own procedures and accountability quirks. There are state politics, local politics, and federal politics to contend with--each with its own set of agendas. But most of all there are children to be schooled--each with his or her own needs. Somehow, all angles need to be considered and a balance struck. In the following sections, we will try to walk the reader through some of these considerations.

Local Budget Process

The first draft of the local budget is prepared by the district superintendent and his or her staff in conjunction with the state budget. The aim is to be able to meet local needs with the combined revenues of state and local dollars. This assumes of course that one can predict what actual needs will be. As our story progresses, it will become apparent that this is not always possible.

Once central administration is satisfied with its local budget proposal it is submitted to the school board, where it could be revised. Following approval of the proposed budget, or some modified version of it, approval is sought from the county commissioners. Here again, the proposal can be approved, rejected, or revised.

If the budget is rejected or modified such that the district can't live with it, school administrators have only one recourse: the courts. Here, they can make a case for their original version and, if fortune is with them, walk away with what they think they will need for the next school year. Judicial recourse is not unheard of in the Seaside area. In fact, one of the bigger cases was brought by the REC director when he was superintendent in one of the LEAs. The county commissioners had gone too far with him; he had his day in court and he won.

County Commissioners

Each county is made up of five townships, each electing one person to represent it on the county governance body. The power vested in this body is quite substantial, as are the politics. In these rural areas, the county commissioners and the school boards are the most formidable entities around. State officials and local administrators, teachers, and parents are aware of the commissioners' power.

The amount of money allocated to all social service agencies, including education, is controlled by the county commissioners. They are the county's funding agents; they levy taxes.

The education portion of the county budget usually runs at about 50 percent of the total county outlay. Of course, the motivation is to hold down taxes, certainly not an unusual position for an elected official these days. However, the county commissioners have traditionally been fiscally conservative. Even so, the schools have begun to enjoy more liberal funding of late. As we noted previously, voter registration and in-migration have had some effect on county purse strings and one can't help but speculate that court cases have had their effect as well. In the Seaside area, private schools have been virtually eliminated, which means more attention for public education from the county commissioners.

Another factor to consider is the relatively low level of importance placed on education by the local citizens. It should not be surprising that some Seaside citizens have more basic things to worry about when one considers that 20 percent of the population lives under the poverty level.

State Aid

We have described previously the state funding formula or, at least, we described the way it works out on paper. We noted, too, the equity issues surrounding the funding formula and pointed out what the state itself has determined to be the features that cause problems for some districts. In this section, we would like to look at the funding formula in action, to see what happens on the other end of the formula, how it plays out in the Seaside area public schools.

Average Daily Membership. Virtually every one of an LEA's 63 line-item allocations is based in one way or another on ADM. The first problem with ADM in the Seaside region is that for the past five years school enrollment has been on the decline. Although enrollment has now stabilized and is even on the rise in some Seaside LEAs, over the past five years the drop has amounted to eight percent. ADM, as a unit of measure, has a different effect on school budgets depending on whether enrollments are increasing or decreasing. ADM, as a prediction device, estimates the number of students at the end of a school year, but the need to allocate teachers occurs at the beginning of the year. Suppose that the enrollment in a district is 1,000 students. If enrollment is increasing, ADM projections might predict 1,100 students for the next school year. For another district with the same number of students but in a declining enrollment state, ADM might predict 900 students for the next. For both districts, the state allocation of teachers is based on these ADM predictions. In the first district, all of the projected 1,100 students will not be there when school opens in September. Some will be there, of course, but the total of 1,100 students will not accrue until much later in the year. The result--an extra teacher or two--not a bad consequence.

In the second district the inverse will be true. The total projected drop in enrollment will not accrue until later in the school year. But, when most of the 100 students who will leave during the year show up in September, the district is short a teacher or two--a bad consequence.

Now one might ask, "What about the ADM adjustment process; won't that fix things?" Well, it will. But not without causing some problems of its own. After the first 10 days of school, the district that was short a couple of teachers can submit an adjusted ADM count and indeed get its two positions. But when the two additional teachers get on board, ordinarily during the second month of school, classes must be reorganized and the result is a massive disruption that teachers and students can ill-afford. Worse even than the disruption, teaching positions are the only line-item allotment that can be recovered through the ADM adjustment process. Materials, supplies, and other staff positions are lost for good.

And then there's the case of the "seesaw enrollment," as one Seaside superintendent calls it. In one of her schools, she has a 25 percent net turnover each year. This is one of the southwestern counties that boarders the adjoining state. Here, entire families move back and forth across the state line (for a number of reasons that will be gone into later). It is not unusual for this school to get six new students in one day, and then to loose five the next day. Rather than contacting the DPI every time there's an enrollment shift, she just lives with fewer resources than she actually needs.

Allotment of Staff Positions. Another problem with the ADM mechanism for the Seaside districts was summed up by one superintendent who said, "Kids don't come in packages of 26." The reference here was to the fact that 26 students entitles a district to reimbursement for one teacher. This rule is particularly troublesome for rural districts that may need to offer classes for fewer than 26 students. The district loses money each time a class is offered with fewer students than the ratio upon which the ADM allotment is based. The more sparcely populated the district, the more often that happens. One positive feature of the allotment system is that teachers are allocated to the district at large, and not to particular buildings. This helps because it allows districts to manipulate resources to better meet their needs. But even this flexibility doesn't always solve a district's problems in a rural area. Deployment of personnel within the district is not an easy feat in a rural county district. For example, a K-8 building with 120 students might require 5.5 teachers, .03 secretaries, .02 custodians. Obviously, this allocation will not work when buildings are widely separated, although it might work quite nicely in a larger district where school buildings are more concentrated. In a rural county, where distance and other travel problems are prohibitive, the only solution is often a more costly one. Seaside superintendents would like to see the "one building/one principal" rule applied to other essential staff.

Special Education Funding

As in the previous section, we would like to give the reader a feel for special education funding from the LEA perspective. The funding procedure, presented earlier in "School Finance," provides resources for the regular education portion of an exceptional child's total program on the basis of the basic ADM formula. Thus, the problems caused by this type of measurement unit for Seaside districts--negative effect of declining enrollments, cumbersome ADM adjustment process, "seesaw" enrollments, and students who don't come in sets of 26--apply equally well to this portion of special education costs. Moreover, the current system for funding the "add-on" portion of special education costs can be just as troublesome, if not more so, for many of the Seaside LEAs.

The add-on funds are allocated on the basis of 75 percent of the state average cost per pupil figure (state funds only) for handicapped students and 25 percent for gifted and talented students. These funds are used to hire special education teachers, administrators (local directors of exceptional children programs), and support personnel; to purchase supplies and equipment; and to purchase related services from other agencies.

The first problem encountered with special education funding revolves around the average state cost per pupil figure. The Seaside region ranks first among the eight regions in actual average cost per pupil. Now this might surprise the reader, given our previous discussions about local school conditions and budgets. However, the inadequacy of "cost per pupil" as a unit of measure is at the root of this apparent contradiction. Cost per pupil is figured by dividing total education expenditures, except for capital outlay, by the total number of students. Figured in the total school expenditure are administrators' salaries. Because of the "one building/one principal rule," which is a blessing for rural schools in most other respects, the lower enrollment in rural schools inflate cost per pupil figures. Thus, for the Seaside districts, the average state cost per pupil figure, upon which their special education "add-on" costs are based, is always lower than it would be if they were located in a less rural area.

The second problem with the add-on funding scheme relates to the "category caps" placed on the number of exceptional children the state will fund. The Seaside region is in reasonable shape with respect to the total allowable percentage of handicapped students at 12 percent; just under the limit of 12.5 percent. However, problems for some of the LEAs crop up when one considers the caps placed on each area of exceptionality. For example, 11 of the 17 districts are over the 3 percent mentally handicapped limit; 12 are over the cap for learning disabled students; 2 are over for speech/language impaired; and 12 surpass the 3.9 percent cap on gifted and talented, with 3 districts doubling it. None of the districts are over the lid in any of the other categories. Another problem here is that schools with fluctuating enrollments may lose money because all their handicapped students may not be identified by the last day to make headcount adjustments (June 1).

So, not only do all Seaside LEAs receive less than they might in add-on dollars overall, but some generate less because of the configuration and/or fluctuation of their student populations across the various categories of exceptionality. And all this boils down to fewer state dollars than are needed.

Of course, the Seaside LEAs have other sources of revenue. Federal funds account for about 18 percent of the regions education budget. In fact, the Seaside region ranks first of the seven RECs in the amount of federal dollars generated. But these dollars have their own stipulations and uses, although recent clarifications from Washington have resulted in the ability to serve some students with both Title I and P.L. 94-142 dollars. The same thing applies with respect to migrant education. How these programs are coordinated will be discussed later in the section "LEA General Education Programs/Federal Programs."

And we can't forget that it costs more to provide the same level of services in the Seaside region than it would if it were a less rural area. Not only does it cost more in dollars, but it cost more in student time. Remember that transportation costs are not a problem for these rural districts; all costs are paid by the state. The real problem, particularly for more severely handicapped and, thus, less prevalent students, is that travel robs them of precious instructional time.

These students are more likely to travel because they are few in number and must be bussed to central locations.

Of course, there is one more source of education dollars for the Seaside LEAs: local property taxes. But we know that, here again, getting enough money has not always been easy for some districts. The Seaside area ranks fourth among the REC's in dollars generated locally. One more factor, local politics, enters into the equation. Local tradition, local politics, and, as we have seen, even local geography, all play a part in determining local education resources and local education needs. The combination of contextual factors interacting with the quirks of the various funding mechanisms affect different districts and schools in different ways. The rest of our story will attempt to show how these factors play out in the delivery of special education and related services in the Seaside area. But let's first look at how special education personnel are allotted within districts once the resources needed to hire them are obtained.

Allotment of Special Education Personnel

As in most other states, the way in which special education programs are arranged is regulated by teacher-student ratio. The state sets limits on the number of students that can be served by one teacher, and in some cases a teacher and an aide. The teacher-student ratio is important fiscally because it regulates the number and types of personnel needed to serve the student population.

Table 5 shows the teacher-student ratio under which the Seaside LEAs operate. Immediately apparent is the fact that educating more severely handicapped students is more expensive because it requires more staff per student. The special education funding procedure treats all handicapped students as if they were equally costly to educate, when in fact this is far from the reality of the situation. Moreover, when moderately and severely handicapped students are not all located in one place, it often takes more staff than that indicated in the teacher-student ratio. These inadequacies in the funding mechanism are more pronounced in rural areas where more severely handicapped students tend to be spread out rather than concentrated as they are in more urban areas.

New Special Education Funding Formula

The local administrators of the Seaside area and their voice at DPI, the REC director, have been pushing for a new special education funding system for some time. They want a system that assigns weights to students according to the severity of their handicap and their distance from the services they need. Built on top of this calculation, they want another weighting that reflects how these two basic costs change from district to district based on the size of the district and the relative sparcity of the population. Finally, they want a base factor; a "floor" that would give a district a certain number of special teachers regardless of student enrollment. Sounds good, but will it fly? Apparently not.

Table 5

Funding Ratio for Teachers of Exceptional Children

Exceptionality	Program Type	Number of Students	Teacher	Aide
Autistic	Full-time Special Class	6 9	1 1	1 2
Gifted and Talented	Supportive Services; Resource; Enrichment; Diagnostic Prescriptive	15 per class period, or 75 per day, or 175 per week	1	-
	Part-time Special Class	25 per class period 100 per day	1	-
	Full-time Special Class	26	1	-
Hearing Impaired	Supportive Services; Resource; Consultant	20 per week	1	-
	Part-time Special Class	20 per day	1	-
	Full-time Special Class	7 preschool/primary 7 elementary 9 secondary	1 1 1	1 1 1
Orthopedically Handicapped	Supportive Services; Resource; Consultant	15 per week	1	-
	Part-time Special Class	10	1	-
	Full-time Special Class	12	1	1
Seriously Emotionally Handicapped	Supportive Services; Resource; Consultant	20 per week	1	-
	Part-time Special Class	6 per period 8 per period 16 per week	1 1 1	- 1 1
	Full-time Special Class	8	1	1
Learning Disabled	Supportive Services; Resource; Consultant	35 per week (direct service) 40 per week (consultative)	1 1	- -
	Part-time Special Class	8 per period, or 25 per day	1	-
	Full-time Special Class	12	1	-
Educable Mentally Handicapped	Supportive Services; Resource; Consultant	35 per week	1	-
	Part-time Special Class	12 preschool/primary per period 12 elementary per period, or 40 per day 16 secondary per period, or 40 per day	1 1 1	- - -
	Full-time Special Class	12 preschool/primary 12 elementary 16 secondary	1 1 1	- - -
Trainable Mentally Handicapped	Full-time Special Class	6 7-12 13-16	1 1 1	- 1 2
Severely/Profoundly Handicapped	Full-time Special Class	6 7-12	1 1	1 2
Multihandicapped	Full-time Special Class	6 7-12	1 1	1 2
Visually Impaired	Supportive Services; Resource; Consultant	35 per week	1	-
	Part-time Special Class	8 per period, or 25 per day	1	-
	Full-time Special Class	8 blind 10 partially sighted	1 1	- -
Speech and Language Impaired	Caseload Basis	No minimum or maximum limits	-	-
	Full-time or Part-time: Language Disorders	12	1	1
Homebound/ Hospitalized	----	12	1	-

The Seaside director and some of the other REC directors submitted such a proposal to the legislature based on these ideas. "It was too sophisticated for the folks they had to sell it to." Moreover, as the director noted, "It required too much change to suit them." The REC directors are advocating for something, anything, that will recognize different costs in different districts, and that something has to allow discretion at the district level for how to spend the money. And just when they thought that this kind of thinking was too much to hope for, they got word of a new special education funding formula.

This funding formula will go into effect in two years and, although it doesn't have a weighting system of any type, it does allow more flexibility at the local level. All the intricacies of the new formula are now known yet, but a few are out.

First, the "category caps" feature will be removed. That is, separate percentages for each category of exceptionality (except gifted) will be eliminated. Moreover,the total percent of handicapped students allowable will be raised to 15. Gifted and talented will remain at 5 percent of ADM. These features are positive for the Seaside area. Recall that most districts tend to be over the category caps for some areas of exceptionality. The REC believes that this will improve matters generally in the Seaside area, but, based on preliminary calculations, the new formula will affect districts differentially. For some, it will be better, for others, worse. One superintendent who has not lost money for three years under the present systems says that the new system will not cover her district's special education costs as well as the old one did; she will lose money.

GENERAL EDUCATION PROGRAMS

The 17 LEAs within the Seaside area provide educational programs for over 61,000 students. Of these, fully one-sixth receive services through programs for exceptional children, about one-half receive Title I services, and one quarter, migrant education services. Over 3,300 teachers serve these students in general and special programs, yielding an overall teacher-student ratio of 1 to 17. Eighty percent of the teachers work in elementary or secondary classrooms. Of the remaining 20 percent, 200 are Title I teachers, 160 are migrant education teachers, and nearly 300 teach in programs for exceptional children.

The intent of this section is to complement the in-depth descriptions of programs for exceptional children by providing information regarding general education programs. These programs include not only regular elementary and secondary programs, but the several supplementary, federal and vocational programs as well.

Regular Education Programs

Regular education programs in the Seaside area are at a basic descriptive level very much like programs in other rural areas. They are carried out in school building classrooms by teachers and administrators and guided by a curriculum. Beyond this level though, many unique twists and idiosyncracies emerge, almost all having implications for handicapped students.

The Schools

Within- and across-school movement of students is immediately evident as one tours the Seaside schools. While we normally think of secondary students as moving from class to class every 50 minutes or so, this movement is characteristic of the elementary level as well. In some districts, at least half and as many as 90 percent of the elementary students go to other classrooms for programming that ranges from normal developmental reading to Title I reading and mathematics programs to migrant education to special education resource programs. Developmental reading programs are offered on the basis of ability level and teachers work with groups comprised both of their own students as well as those from other classrooms. Thus, mildly handicapped students and Title I students can blend into the flow of virtually all students during reading periods.

Far less positive impact on students from a program perspective comes in the form of families of students who move across schools, and sometimes across states. Indeed, migrant families move across states several times a year. Yet their children actually represent only a small percentage of these mobile students. In some cases, transient families move into the area for a respite from unpaid taxes owed in an adjoining state; when the heat dies down, they hook their trailer to a truck, or collect their deposit if it was leased, and move yet again out of the area.

This turnover in student population creates a lot of administrative headaches--although one mild analgesic has been the Migrant Student Record System. But the record system does not abate the budgetary effects of, say, a 25 percent annual turnover, reported by one superintendent, which in turn shrinks the potential ADM as these students tend not to show up until after head counts are taken. It is quite difficult to project, let alone fund, the appropriate number of teachers given student turnover rates of this magnitude.

Nor can the record system rescue those responsible for or involved in special education referral/placement paperwork. Some transient families have a handicapped child, sometimes more than one. A few parents, a small number of them with handicapped children, move from place to place to "beat the rap" on neglect charges--real or trumped up. The migrant record system accounts only for migrant families; thus, while handicapped students of migrant families can be tracked, those of transient families cannot. One local special education director indicated that at least one categorical area quadrupled in the number of students one year. Compounding the administrative hassles such fluctuation causes is the discontinuity in programming when student records do not follow the student. Not the least of those affected are well-meaning teachers who work intensely on IEP development only to find the object of that program gone and an IEP-less student in his or her place. Fortunately, these mobile students are not indicative of the majority of the area's students who maintain stable attendance. But, it is cumbersome and sometimes impossible to plan for those who are transient.

Program quality in the schools is somewhat remarkable given the poverty and transience evidenced in some of the counties. Title I services require placement on or below the 49th percentile on reading and mathematics achievement tests. Thus, many students are accessed to general supplementary and federal programs over and above regular offerings. In addition, the decline in the number of private schools has resulted in more children of middle- and upper-class white families attending the public schools in the area. As we have seen, formerly segregated schools have become increasingly integrated and consolidated, thus partly offsetting the effects of transience, poverty and segration on program quality.

Building Staff

For the most part, teachers are locally born, raised and educated. The state's most pretigious university graduate training program in special education requires very high GRE scores for admission; thus, many teachers, have elected undergraduate programs offered by institutions with lower standards. Some white teachers are unprepared for and, in a few cases, uncomfortable with their black students. Further eroding the overall quality of teachers is the national trend for the most promising teachers to be drawn away by higher paying industry jobs.

The state is concerned with these problems; however, the foremost of its concerns is the appraisal and improvement of teachers by principals. Principals are given leadership and supervisory training. They are required to evaluate teachers and use this training to improve their teaching staff.

The state maintains a Leadership Training Institute (LTI) for building principals. The LTI is operated by a director and an assistant director, as well as three interns. The interns are building principals who receive leaves from their LEAs, participate in the internship, and return to regular duty afterwards. In this fashion, it is hoped that newly acquired leadership skills would have a ripple effect; ultimately improving the instructional quality in the building.

Another major effort in general education improvement has been the state wide effort to upgrade the overall quality of instruction. To accomplish this, the state set up a two-week workshop at the beginning of the school year. Selected teachers attended the workshop and received training in Madelyn Hunter's seven-step instructional delivery procedure. In general, the procedure fits well with the Seaside LEA's administrative pattern of grouping students by ability level; and the teachers reported that the program has increased their awareness of their own instructional approaches.

The state also can respond to the region's staff development needs through its only REC staff development program area which, as mentioned, is located at the Seaside center. The Staff Development Coordinators Council encourages LEAs to involve the unit in the planning and delivery of programs to various LEA personnel. Upon request from the LEAs, the council serves in a clearinghouse capacity, processing LEA staff development needs and matching REC program areas and staff to them.

Results of needs assessments are typically forwarded to the Council for consultative assistance. If other REC program areas can assist in a staff development program, the Council will help coordinate those efforts. While DPI requires no formal communication channels between the REC and the LEAs, most LEAs utilize the service anyway, especially if they want to collaborate to provide inservice programs related to working with handicapped students.

DPI allots each LEA as well as the REC program areas monies for staff development. Each REC program area can spend 5 percent of its budget on these activities. The exceptional children programs alsocan propose activities to DPI for approval and funding from the DPI's P.L. 94-142 dollars.

LEAs receive staff development funds from two sources. They receive 43 cents per student within their general education allocation. Also, LEAs can spend up to five percent of their total state special education add-on dollars for staff development related to educating handicapped students.

The state is flexible in regard to the LEAs' pooling of these funds. The major advantage of the REC's staff development unit relates to the coordination necessary to pull off meaningful programs in a cost-efficient manner. Any number of LEAs can collaborate to produce an inservice program. They can produce it themselves, letting the REC handle logistics; or they can use the REC's staff development coordinator as a broker for the services from other REC divisions such as mathematics or special education.

These inservice programs also serve as vehicles for teacher certification. The state requires certification renewal for all teachers every five years. It also permits LEAs to offer certification credits toward this renewal, and LEAs can arrange the necessary programs using the procedures as described above.

In addition, when the need arises, LEAs can work through the REC and area teacher training programs to staff new programs for exceptional students. This occurred during the 1980-81 school year when several newly certified teachers of the gifted and talented came on board. Anticipating this need a year or so earlier, the LEAs approaches DPI and the REC requsting that the REC work out an acceptable arrangement with a nearby teacher training institution. Since the university had no gifted/talented program, the REC developed the curriculum and the college provided instructors.

Other programs have included a multi-district inservice program for driver education teachers that focused on characteristics of, and instructional modifications for handicapped students. Here, the coordinator of the exceptional children program area arranged program content, while the staff development coordinator handled program management and cost-sharing agreements among the participating LEAs. The fact that 1981-82 will bring the termination of the Staff Development Coordinator's position is unfortunate--as much or more for the LEAs as for the REC.

Classroom Organization

Most of the LEAs use homogeneous or "ability" grouping to organize reading instruction. As we have mentioned, students sometimes change classrooms in order to receive reading instruction more precisely matched to their needs. Mildly handicapped students become a part of this grouping scheme and tend not to be singled out with respect to changing classrooms.

However, at the junior high level, it becomes fairly apparent that the higher ability groups are college-bound and the lower groups aren't. It is the opinion of some that in some cases the higher performing groups are assigned the better teachers.

Curriculum

Some of the LEAs use an objectives-based curriculum in which students' performance is monitored using criterion-referenced tests that are keyed to these objectives. Two advantages result from this system: first, the curriculum lends itself to a continuity with the state's Annual Testing and Competency Testing programs; and second, the curriculum objectives--specific and measurable in their delineation--serve as a common denominator for cooperation among regular and special educators. Since most resource programs in the area operate according to the tutorial model, teachers are able to base their relative roles in the instructional process on a common benchmark: the curriculum objectives. This not only acts to facilitate communication, it also helps clarify an oft-cited problem in the education of handicapped students--grading.

Grading and Evaluation of Students

As one would expect, student evaluations consist of grades and of test performance. Most LEAs have a fairly consistent grading policy for Title I and special education students. Secondary students do not receive grades for remedial reading and mathematics work in Title I programs. Some secondary students show a reluctance to go to Title I classes because the lack of a grade is one way they are singled out from their peers.

Conversely, special education students do receive grades, but individual LEA grading policies do differ. In one county, students are graded on the average of their regular and special class grades in each subject. If a student receives only special education only in a particular subject, he or she is graded by the special education teacher. In another county, handicapped students are graded in comparison to their current achievement levels. For example, a fourth grade, handicapped student achieving at a second grade level in second grade might receive an A or a B; thus he or she is graded on performance and not penalized by the handicap.

At least one school generally promotes handicapped students once they reach the junior high school level so that they can have access to vocational education at the secondary level. However, the Seaside area schools are not that liberal with the remainder of the student population. In some cases, students have repeated a grade two or three times. In most cases, teachers are not reticent to retain a student. By the time such students reach high school, it's not surprising that a few drop out, especially those from migrant families who by this time are established workers.

Student performance also is tested through the Annual Testing Program (ATP) in grades 1, 2, 3, 6, and 9 and through the Competency Test Program (CTP) in grades 11 and 12. In 1977, both the ATP and CTP were mandated and the programs were begun in the fall of 1978.

The ATP consists of reading and arithmetic inventories in grades one and two that are criterion-referenced and primarily diagnostic in nature. Then, students take the California Achievement Test (CAT) in grades three, six, and nine. Ninth-grade students performing poorly on the CAT are at risk of not passing the CTP in their junior or senior years given the high correlation between CAT and CTP scores. Students may have as many as eight opportunities to take the CTP. To pass, students must score satisfactorily in both the reading and mathematics components. Students who don't pass are entitled to remediation through funds passed to the LEAs by the state department. However, LEAs are not required to provide this remedial help. Thus, some students simply exit school with a graduation certificate stating that he or she "has not passed the minimum competency exam." Students are able to return to retake the CTP after leaving school.

Each year half a million students across the state take the competency exam. Thus, state and local officials regard it as "a bear to implement." However, the greatest concern is the level at which students are required to take the test--students take the test that is appropriate to their age rather than their achievement level. Thus, many take tests of higher difficulty than that with which they can be expected to cope successfully.

Handicapped students are granted special conditions in regard to both the ATP and CTP. They may be exempted from participation in the Annual Testing Program upon the recommendation of the school-based committee which has the responsibility for developing the student's individualized educational program. More will be said about this committee in the section, "Identifying and Processing Handicapped Students."

Most handicapped students who are mainstreamed into regular classrooms for at least 50 percent of their instructional classroom time take part in the Annual Testing Program.

The school-based committee is responsible for designating the level at which a special education student should be tested and notes it on the student's individualized educational program. The plan may recommend testing at the student's designated grade level or another grade level. In some cases the testing of special education students may require the alteration of the standard test administration procedures. Modifications can include things like audio-cassette presentations, large-print materials, and extended test-taking time.

Supplementary Programs

Supplementary programs fall into three categories: preschool, non-federal remedial programs, and the Alternative High School.

Early Prevention of School Failure

The EPSF program reflects a state wide effort to screen kindergarten children to identify those at risk. The state provides funds at a level equivalent to 10 percent of kindergarten and Head Start head counts in order for moderate- and high-risk kindergarten and first grade children to receive services. These funds are separate from special education funds.

The EPSF high-risk programs offer 30 minutes a day of extra programming. Often, these programs are staffed by regular teachers, who are paid for the extra work.

Non-federal Remedial Programs

Although special education and Title I are the largest special and supplementary programs, respectively, some schools provide their own remedial programs. Some are state-funded, others are funded locally.

The remedial program for students who do not pass the CTP is offered at the discretion of each LEA. In the Seaside area, most of the LEAs do provide students with remedial help. Some high schools provide remedial help to students in reading and mathematics by having students attend remedial classes, staffed by regular teachers, instead of receiving study hall periods.

The Alternative High School

Most exemplary of the supplementary programs is the Alternative High School in one LEA. The school was started in December of 1977 via state and local funds that supplemented a grant to the LEA by the Federal Law Enforcement Assistance Administration. State support came through the Governor's Crime Commission. Perhaps the most telling effect of the school is reflected in local police testimonials to the positive differences they've observed in the students since the outset of the program.

Indeed, other Seaside counties have begun considering the alternative school concept and have sent teams of planners to visit the alternative school. Since state law prohibits LEAs to send so-called "status offenders," i.e., truants, runaways, and delinquents, to vocational-technical schools, most LEAs simply suspend such students. However, because the state authorizes local communities to expend local resources to serve these students, and given the success of the current althernative program, the concept has emerged as a viable option to in-school suspensions.

Disciplinary procedures are simple, yet effective given the student population of whom about 80 percent are referred by the LEA's other high schools, 10 percent are referred by the courts, and 10 percent are dropouts. The eight white and 23 black students all have opportunities to serve on the school's disciplinary committee, which is comprised of five students and two teachers at any one time. The committee meets weekly to "hear" the cases of students referred to it by other students and teachers. Recommended action is then forwarded to the principal, who ultimately implements disciplinary action.

That responsibility, however, is minimal when compared to other skills the principal must bring to bear. Among these are the collaborative efforts with other agencies to maintain the school. With the help of CETA and parents, she was able to get the somewhat shabby facility renovated into a more pleasant place to live and work. She also has chaired a task force appointed by the county commissioners which enabled her to work with other agencies arranging trade-offs resulting in all the extras for her school and her students. Finally, she faces a somewhat unique task in running such a school in a rural area. Her urban counterparts typically serve students who have dropped out and/or those tagged with the "discipline problem" label. However, as principal of a rural alternative school, she must provide academic and vocational programs that can serve all students--those who have dropped out, have faded out (grown apathetic), or have been pushed out."

Indeed, almost half of these students--16--are handicapped. Four are identified as learning disabled, 11 as mildly retarded, and one as emotionally handicapped. In addition, the school serves three moderately retarded adolescents for one hour each day.

The mildly retarded students have either passed or made gains on the CTP since attending the alternative school; but the real success stories are the moderately retarded students. The principal felt that both her students and the full-time moderately retarded students could benefit from this service arrangement. The full-time students not only demonstrate acceptance of the TMH students; they tutor them--a mode of self-expression that could be unique to their experience. The TMH students are served in a self-contained class during the remainder of the day at a primary school in the LEA. Next year, the principal hopes to serve the three students full time.

Special education is dressed in unique wrappings in this school. The school's climate allows for all educators (and students) to be, in a sense, special educators. The students tutor, help, and participate in disciplinary decisions with one another. All of the vocational educators have vocational education/special needs endorsements. Most of the academic teachers have had some special education training, and some are certified in special education. The principal also has been able to convince the LEA to staff the school with two half-time special education teachers.

None of these achievements have come through an isolated approach on the part of the principal. When she first started the school, she noted that there were students among her drop-, fade- and push-outs who she and her staff believed to be handicapped. She immediately set out to have these students formerly identified so they could receive the services they needed. No psychological assessments were available and none seemed forthcoming. Again, her lobbying efforts brought results, this time in the form of psychological services. Currently, her staff has identified more students as handicapped and these students now are being processed for special education.

Perhaps her most beneficial collaborative initiative has been in the case of an emotionally handicapped student whose history of aggressive behavior resulted in yet another label: "Bennie B."[1] The student had been released from a juvenile facility and the LEA was required to place him in school. The principal drew together no fewer than three other agencies including the Seaside REC and social services (which had custody of the youngster) and planned roles and responsibilities for each in order to serve the student. This collaborative effort was predicated on the feeling of each agency that "no one can do it all alone"--a motivating force behind the success of the collaborative effort.

Federal Programs

The state funnels most of its federal dollars to LEAs via Title I of the Elementary and Secondary Education Act, and through Migrant Education funds. Local districts and Seaside staff have found the "do it all alone" axiom as unpalatable as the alternative high school principal found it. We will see that it is in the best interests of handicapped, disadvantaged, and migrant students to serve them as one sees them: certainly not as mutually exclusive.

---

[1] As we shall see in a later section, Bennie B. was one of a group of plaintiffs who brought and won litigation to fund special programs for aggressive, adjudicated youths.

Title I

Individual school districts qualify for Title I programs on the basis of the proportion of families whose income falls below the national poverty level. Once a district qualifies, individual children within the system qualify for Title I services on the basis of their academic performance, regardless of whether the families of the specific children are living below the poverty level. The amount of federal funds a district receives fr Title I depends on the number of families within the district who are below the poverty level.

To be eligible for Title I services, children must qualify as being "educationally disadvantaged" according to their academic percentile ranking. The federally-mandated cut-off point is the 49th percentile. Students are identified for Title I services by monitoring the composite achievement scores of the Adademic Testing Program or by teacher nomination. In either case, students whose level of achievement places them at or below the 49th percentile qualify as educationally disadvantaged and thus eligible for Title I services.

Programs are offered in 16 of the 17 Seaside LEAs because of the pervasive poverty evidenced in the area. The proportion of LEAs that qualify for Title I services is greater here than in any of the eight regions of the state. Programs run from first through twelfth grade in remedial reading and mathematics. It is interesting to note that Title I offered the first kindergarten programs in the state and as such played an important role in their development on a state-wide basis. With the advent of state mandated kindergarten programs, and particularly with the development of the Early Prevention of School Failure program, Title I kindergarten programs were no longer necessary.

LEAs submit a plan to the state's Title I agency every three years with annual updates. These plans and updates basically indicate number of students to be served and how funds will be spent. Like special education, Title I technical assistance and monitoring is regionalized. Each of the eight regional agencies has a Title I director. The Seaside Title I person has no problem with mixing technical assistance and monitoring since, ultimately, both methods result in compliance.

Neither monitoring nor technical assistance is sufficient to prevent relentless federal budget snipping. According to the Seaside Title I director, they've never been able to serve all students who qualify. Available resources have always been rationed and so, not all worthy students can receive remedial services. Eligible students are rank-ordered from the 1st to the 49th percentile; typically, students who rank between the 1st and 20th percentiles receive special education as well as Title I services.

As with regular and special education, a major concern resting with Title I service providers is parent participation. Like their special education counterparts, these staffers note that although parental involvement is generally less in rural areas because of distance factors, parents of elementary-level students are more participatory than those of secondary students--a time when parent interest appears to wane. As part of their Title I plans, LEAs are required to establish regional

Parent Advisory Councils. And, some districts pool their special education and Title I parent groups to foster more parent involvement than would occur if Title I and special education parent groups were separate.

Some Seaside parent groups also benefit from some unique inducements to attend meetings. Often, students are involved in the program, putting on skits and the like. One agency staff member introduced "make it and take it" sessions as a strategy to make teacher workshops more enjoyable; the application of the idea to parent meetings has been equally effective.

Besides their respective concerns regarding parent involvement, Title I and special education share other concerns: students. Thanks to a visit to Washington two years ago by the state's directors of Title I and special education, eligibility rules were clarified and students eligible for Title I and special education now can get both services. A disadvantaged physically handicapped student can benefit both from Title I reading and from special adaptive equipment and instruction for example. This approach reduces duplicative services and stretches precious dollars; about 50 percent of the areas's Title I students also receive some special education services.

The essence of Title I-special education collaboration is in the training and philosophies of the leadership personnel in the Seaside Regional Center. The Title I director conducts training sessions in human relations for teachers--regular, remedial, and special. His philosophy (consistent with the REC director's philosophy) is to encourage collaborative efforts in all arenas, since to him such efforts represent the only viable way to offset shrinking, already thinly rationed resources in a predominantly low-income area. Imminent budget cuts underscore such a philosophy.

With the passage of the Educational Consolidation and Improvement Act in 1981 "Title I" has been changed to "Chapter 1". Apparently, there have been no program changes; Chapter 1 is still geared toward educationally disadvantaged students. The essence of the original rules and regulations is still in place. But while Title I rules and regulations required 50-60 pages, the Chapter 1 equivalent takes up only about 10. The biggest change has been in the aforementioned Parent Advisory Council. With the new Chapter I regulations, LEAs do not have to maintain an active, formal Parent Advisory Council. LEAs now merely need to show documentation of individual consultation with parents as the need arises. Most Seaside LEAs now use local PTA groups as a vehicle for parent involvement, particulary since PTAs are coming back to life in the region. Those who do not use PTAs most often involve parents through "called meetings".

The big news is not the changes in regulations, however, but the further thinning of resources. The trade-off between more flexibility and less money is a poor one. Locals expect a 20 percent budget reduction meaning that about 4,000 currently served students will be cut from the rolls, thanks to the federal policy of unencumberment. Smaller schools will be hit worst since the loss of the Title I teacher means the loss of the Title I program. Local economies will be affected because of teacher and aide layoffs. Local county commissioners have not been willing to allocate funds to maintain the programs at their current levels. The current regional budget of $7.5 million then is anticipated to drop to about $6 million. And all of this is the price for supposed flexibility--a flexibility that already existed in the Seaside area because of active collaborative efforts.

Migrant Education

Migratory students can qualify simultaneously for special education services; and twenty-five percent of the Seaside migratory students receive them. In fact, migrant education is the most flexible program of the three (special education, Title I, and special education). The only real requirement is that the child quality as "migratory" (definition follows below), beyond that, special education and/or Title I services can be built around the child's actual needs. Relative to special education, three options are available. First, services can be provided in a migrant education resource room. Here, an individualized plan is written for each student--handicapped or not. The second option inclues services in both a migrant education resource room and a special education resource room. The third option provides services in a special education resource room.

The uniqueness of the migrant education resource room program lies in the fact that it assesses and attempts to fill the gaps in these students' educational experiences. It also attempts to reduce duplicative experiences by pulling students out of the regular program when teachers cover material the students have learned in other schools. A big part of the job in working with migrant education students centers on improving their self-concepts. Those who work with these children identify low self-esteem as the foremost problem.

Who is this migrant education student? He or she may be either currently or formerly migratory. A "currently migratory child" is one whose parent or guardian is a migratory agricultural worker or migratory fisher and who has moved within the past twelve months from one school district to another to enable the child, the child's guardian, or a member of the child's immediate family to obtain temporary or seasonal employment in an agricultural or fishing activity.

A "formerly migratory child" is one who was eligible to be counted and served as a currently migratory child within the past five years but is not now a currently migratory child. The child must live in an area served by a migrant education project such as the Seaside area. Also, the school must obtain the parent or guardian's permission to continue to consider the student a migratory child. Thus there is a total of six years of program eligibility--a one year status as a "currently migratory child" and up to five additional years as a "formerly migratory child." For the purpose of this definition, "area served by a migrant education project" means any portion of the geographic area that is within the legally prescribed boundaries of a local educational agency (LEA).

Most of the migratory students who qualify for special education are mildly handicapped. Again, the importance of collaborative efforts cannot be overstressed. The migrant education resource teachers are effective with the handicapped students because they work closely with special, regular, and remedial teachers. The LEAs find this collaboration essential from both a fiscal and a programming perspective. Fiscally, they must ration ever-shrinking dollars. Programmatically, communication and collaboration among the three programs produces uniformity, continuity, and reduced duplication. For example, Title I and migrant education teachers in each LEA meet twice a month to coordinate students' programs. Although special education teachers are not required to meet, often then do; and when they don't they communicate formally by providing a brief write-up on each student relative to his/her objectives and questions concerning changes and adaptations. The major thrust of this collaboration, of course, is program continuity--especially crucial for the migratory students.

Besides direct instructional services aimed at continuity, there is a technological service provided by the REC also geared toward continuity--the Migrant Student Record Transfer System (MSRTS). Public Law 89-750 which authorizes funds for establishing or improving programs for migratory children includes the requirement that the records of these children be transmitted from school to school. Each school in the state enrolling migratory children under a migrant education project funded by this law must cooperate in this information exchange.

The MSRTS is a computerized data system capable of providing data on any migrant child to any of the cooperating states in the system. It was designed to permit schools to share migratory student information--thereby freeing the schools to serve children's needs rather than merely identifying them. The system makes educational and related information on any child available to any school in the shortest time possible. By using this computerized system, any school in the state may contact the teletype terminal operators and request information on any migratory child enrolled in the school.

The need for such a method of transferring migratory student information has long been recognized. Efforts directed toward the transfer of student records were made in the late 1960's. At that time student records were processed manually and transferred from one state to another by mail. These early efforts did not meet the informational needs of the schools, but they did lay the groundwork for the present system. With the development of a uniform recording instrument for each student and the assistance of computer technology, a school can now be provided with essential information on a migrant child within a brief period of time. The state directors of Migrant Education developed and implemented a system to serve all states in 1968; Seaside's state was tied into it in April of 1971.

The Migrant Student Record Transfer System has multiple uses for administrators and educators in migrant education projects. The continuity of the child's education can be maintained, the special interests and needs of the child can be identified, and special health conditions can be acknowledged. As a result, the student can be placed in a suitable curriculum sequence, and the services of other school and community resources can be coordinated. These data enable teachers and other instructional personnel to provide more meaningful learning experiences for the migrant child. Medical personnel are enabled to serve the students' specific health needs.

An important consideration is that eligible migratory children can be identified and recruited, and because they are enrolled in the system they are counted in the enrollment base which is used to determine the allocation of funds available to the state for carrying out the migrant education program.

Vocational Education Programs

Eight vocational programs are represented in the Seaside schools: agriculture, business-office, marketing, health occupations, industrial arts, industrial education, vocational development with special populations, and home economics. The primary aim of these programs is student employability. Student "transferability into adult life" is stressed. Each program is based on core competencies and performance test banks to enable student progress to be monitored precisely. About 80 percent of the area's high school students are enrolled in some type of vocational program.

Vocational instructors must have five years trade experience to be certified. In addition, they must complete a teacher training program in vocational education and teach two years prior to full certification. The bottom line requirement is a proven work record rather than a bachelor's degree. Those who work with handicapped students are not required to have had any special education coursework.

Each of the eight vocational areas is divided into three components: cooperative education, work study, and internship. The first, cooperative education, involves correlated in-class and part-time job experience. During this stage, schools attempt to provide students with a variety of experiences and involve parents in decision-making regarding vocational areas to be studied in depth. The second, work study, involves in-class instruction and work experience that are not necessarily correlated but are of a more in-depth nature; the third component, the internship, places the student in a job setting full time for a specified period. The student may or may not be salaried. Chief among the notable aspects of this component are the follow-up conferences involving the student, his/her instructor and the employer. This collaborative effort may explain the region's uniqueness with respect to employment rates of vocational students. One is not surprised at the difficulties rural communities have in absorbing vocational students needing work study placements; there simply is not the variety endemic to urban areas. However, the employment rate in the Seaside area exceeds both the national and state averages. Only six percent of the vocational students who subsequently sought jobs during 1981 failed to secure them.

Vocational Education for Special Populations: Handicapped Students

Programs for handicapped populations represent one of the eight vocational areas. The Seaside REC attempts to help vocational instructors create a continuum of least restrictive placements for students. Annual vocational education plans submitted to the state are developed cooperatively between vocational personnel and the REC's director of special education.

These plans set forth three levels along this continuum of least restrictiveness. The first is a regular vocational program. If special provisions are necessary, local personnel together with REC staff attempt to provide or adapt materials and resources. If these provisions do not suffice, the student is provided a "learning lab" placement; and, finally, a special program may be designed by vocational and special education personnel. The rule of thumb guiding this process is that instruction, not curriculum, should be the target for adaptation and modification.

This credo is not possible unless vocational instructors are properly trained. Some vocational administrators believe that fear prevents many instructors from appropriately modifying their instruction. Until the state mandates a required course or sequence of courses in special education for vocational personnel, some believe that these teachers will continue their present practices. Thus, locals again must actively seek a solution themselves. One local vocational director provides inservice experiences for his personnel in which he procures a trainer from either the REC or the state, selects trainees from area schools, has them trained, and requires them to provide others in their home schools with the same training. This trainer-of-trainers model appears to have yielded some success; but the fear component continues to get in the way.

Tri-County Career Center

The TCCC, perhaps the most exemplary collaborative venture in the Seaside area, is a "united" cause shared by three county LEAs because each realized it could not afford career/vocational educational programs alone. The three counties wanted a wider variety of programs that could be vocationally-oriented and yet involve advanced, related academic work in mathematics, science, and the humanities.

By 1978, vocational directors in all three counties had reached a point where each was adding a new vocational program each year and could afford no more. Upon meeting and sharing their concerns, they agreed to arrange a feasibility study that spanned the next year. The study recommended that the counties go ahead with a joint effort. By late 1980, the center was established.

The director indicates that two characteristics are essential to keep the program running smoothly. The first is flexibility; there are three LEAs involved, three types of operations, three superintendents--he works for these superintendents. And secondly, one must know how to operate w̅i̅t̅h̅in each of these three environments simultaneously. That is, there are three different sets of personalities with which he must interact, and three different budgets to which he must adapt. He must stay on top of all matters, keeping everyone informed, everyone a part of the operation. Collaboration--whether out of necessity or desire--is an art form.

Handicapped Students in the TCCC. During the past school year, over 90 handicapped students were enrolled in the TCCC which received a $60,000 grant to develop hands-on materials for students who were handicapped, but who were deemed as having "terminal employability." The programs offered provide for summer school to combat regression, and short courses in which students are given intense training in skills specifically related to their particular job area. The TCCC fell short of a 60 percent job-placement rate but was able to place 35-40 percent of their graduating handicapped students in jobs.

LEA SPECIAL EDUCATION PROGRAMS

Authority and Responsibility for P.L. 94-142

The state board of education accepts full responsibility for the implementation of P.L. 94-142. It delegates the responsibility for carrying out the Act and monitoring compliance with it to the DPI. The state board's authority with respect to the design and content of special education and related services extends to and over the Department of Human Resources and the Department of Corrections (and their respective divisions and agencies). These two departments are responsible for maintaining the same standards and assuming the same responsibility as LEAs under P.L. 94-142. All children and youth under their care, custody, or control are afforded the same rights as exceptional children in the public schools. The specific responsibilities of the DPI and these departments, among other agencies, are laid out in the formal performance agreements that were presented earlier in the section "State Education Agency." How these responsibilities are carried out in the Seaside region will be discussed in "Related Services," later in the case.

Responsibility for P.L. 94-142 at the LEA level rests with the local school board and the district superintendent who are ultimately responsible for implementation at the local level. Local administrators and service providers see the rules and regulations of the Creech Bill as the guidelines under which they operate. And as we have noted, the state special education law mirrors P.L. 94-142. Being in compliance with it assures local compliance with P.L. 94-142.

Local districts submit an application to the state which assures that they will comply with P.L. 94-142 and the state special education rules, which are the operational procedures for Creech. The LEA applications are approved or disapproved on the basis of their conformity to the appropriate P.L. 94-142 regulations and the state rules. Applications that are disapproved are returned with a rationale for disapproval. The DPI offers technical assistance to districts whose applications must be revised. Upon approval of their application, each district is certified as eligible to receive P.L. 94-142 reimbursement.

Administration and Governance of LEA Special Education

Administration

Each of the 17 Seaside LEAs has a local director of special education who coordinates district special education programs and services. In the past, most local directors served in other district capacities as well (Title I Coordinator, Migrant Education Coordinator). While districts are not required to have a local director, all Seaside LEAs have one and only three Seaside LEAs currently fund the position at less than full time--a clear recognition of its special demands.

Within the administrative hierarchy, local directors are responsible to the superintendent and responsible for special education teachers. When they are in school buildings, however, they are under the authority of the building administrator. In most districts, local directors meet with principals on a monthly basis for problem-solving and information-sharing sessions. A big part of the job, beyond supervision of special programs and teachers, is public relations work in the schools with teachers and administrators. In fact, much of the time spent with building administrators amounts to informal staff development sessions through which principals have learned a great deal about special education. The REC special education staff see this as one of the most important accomplishments of the local directors. Many principals have come to depend on local directors as problem-solvers, rather like special education trouble-shooters. Districts can fund the local director position from their state add-on special education dollars. The general impression one gets is that the role of local director is well worth the costs.

The local director serves as the contact person for the REC special education staff with respect to programs for exceptional children. REC staff assist the local directors to make the most of available funds and to use staff efficiently. The amount of contact between REC staff and local directors has fallen off lately as REC staff have become more heavily involved in monitoring. Even so, the REC special education director's job is to keep the local directors "on top of what's happening" and, through them, keep the districts in compliance.

Governance

The district school boards have the ultimate authority over for all school matters, including special education. However, parent advisory groups in some districts represent an informal governance structure. There is no standard pattern for the creation of such groups, although the REC encourages districts to at least hold information-sharing sessions for parents. Moreover, the REC planning specialist forms parent groups and provides training for them on request. Another vehicle for parent advocacy and training is a state level project that supports parents training other parents to advocate for their children.

The arrangement for parent advisory groups in the Seaside districts that have them varies. Some LEAs pool their required Title I parent group and their special education group to form one advisory group. One of the special education teachers in another district characterized her district's PAC (Parent Advisory Council) as "fancy" compared to traditional parent-teacher interactions. Their PAC has guest speakers and books that parents can check out. And the superintendent and the local director of special education both hold high attendance records at PAC meetings. The only chink in the arrangement, she says, is that parents of gifted and talented youngsters do not attend.

It's not clear why parent groups have not "caught on" universally. One superintendent explained that, in his district, the special education programs are good enough to have precluded the need for a parent group to have emerged. One school board member explained that parent advocacy was not an organized group arrangement in his district and that district parents seem to have a lot of misconceptions about what the schools are supposed to provide for their handicapped children.

One teacher of multiply handicapped children related her experiences with the parent group she organized. At first the meetings were awkward because parents were uncomfortable talking about academic achievement. But things picked up over time when they found that they could talk about their feelings--"expectations for children, doctors' bad advice, guilt."

An area chapter of the Association for Retarded Citizens (ARC) had been active for some time in one of the poorer Seaside counties. For several years, they raised money for field trips for TMH students--nothing fancy, just a trip to a department store or a restaurant in another county. Their home county has neither. No money was raised this year, however. The TMH teacher and local director explained that chapter activity has dropped off because the "civic-minded, middle-class" parents who were the mainstay of the organization were no longer in the area.

On a statewide basis, parent advocacy was very instrumental in the passage of the Powell Bill and the growth in special education leading up to it. One hears two different terms used to refer to advocacy organizations: advocacy groups and "pressure" groups. The distinction appears to be the way each goes about its business. Advocacy groups are more subtle, non-threatening. Pressure groups in this state, we were told, at times have done more harm than good; they pushed too hard, pushed the wrong people, and pushed at the wrong times.

Compliance Monitoring

The responsibility for monitoring compliance with P.L. 94-142 and Powell is assigned by statute to the DPI. Under the old monitoring system, Program Review and Evaluation Procedure (PREP) teams were formed to conduct paper review and on-site compliance activities. PREP teams were made up of three staff members from the Division for Exceptional Children, a REC coordinator of exceptional children programs, a local director of exceptional children programs, a principal, and either a regular or special teacher. Each district was to be slated for an on-site visit once every three years. However, the receipt of 10 complaints on any one district prompted a visit within 30 days, regardless of whether the LEA had been scheduled for a visit or not.

A "self-study" protocol was sent to each district to be monitored. District personnel completed the self-study material in preparation for the visit while the DPI members of the PREP team reviewed the district's program applications and any other materials that had been submitted by or about the district on file at DPI. Once on site, the PREP team interviewed regular and special teachers, principals, parents, the local director, and other administrators. Other relevant documents, like individualized education plans (IEPs), child counts, and screening procedures and instruments were reviewed. The compliance visit ended with an oral exit report which formed the basis for a written report that was sent later to the superintendent, the local director, and the REC coordinator of exceptional children programs.

Each LEA then submitted a compliance plan which specified how all noncompliance infractions were to be corrected. The REC special education staff provided technical assistance to the LEA in correcting the items noted in the compliance plan.

The DPI's goal was to monitor one-third of the state's LEAs in 1979, the first year of monitoring. And, although it fell short of its mark for the state, it did much better in the Seaside region that year, monitoring 7 of the 17 LEAs. Whereas one would have to give the PREP teams high marks for effort, the Seaside LEAs graded them considerably lower on achievement. The visits tended to emphasize paper compliance. District administrators report that the teams spent most of their time buried in student folders and had limited contact with teachers and other school personnel. Even when something was missing from a folder, PREP team members rarely asked for help or an explanation; they merely left a blank on their checklists and went on.

Of course, these blanks added up. In the end, some districts were found to be seriously "out-of-compliance," but the locals called this unfair because they felt they could have supplied the missing information if only someone would have asked for it. After all, this was the first time they had been required to assemble such a mass of documentation and they were not totally prepared for it.

Probably the worst horror story was the district whose compliance results somehow found their way into the local paper. The headlines read, "Eighty percent of district's exceptional students misplaced." Needless to say, the superintendent was upset. He explained that if one item on the PREP team's 65-item checklist was missing, the student's folder was considered to be incomplete. An example of a missing item was that there was no beginning and ending time noted on the minutes of the IEP meeting.

The 1979 monitoring was not a pleasant experience for the seven Seaside districts. Moreover, the PREP teams came in, did their review, reported their findings and left. The districts and the REC picked up the pieces and went on. The districts resented the whole affair. And, although REC staff was shocked and concerned when they heard that they would be doing the monitoring from now on, there is little wonder why the LEAs let out a collective sigh of relief.

REC Monitoring

In most ways, the new monitoring procedures are just like the old ones--the same criteria, the same self-study guide, the same forms, the same general procedures. However, there are two differences: the people and the purpose. The people are locals; the REC coordinator and personnel are from other districts in the region. And although the purpose of monitoring is the same from a legal perspective, most similarities end there. Let's talk about the people first.

Site-visit teams are now composed of the REC coordinator, a local director of exceptional children programs, and a principal. All team members are drawn from the Seaside region. There was some concern at first about having people from one LEA monitoring a neighboring LEA, but that was taken care of by making sure to select team members from noncoterminous districts. Once onsite, the three-person team spends most of their people-time with building administrators and local directors. Folders and other print material are reviewed as well to satisfy DPI, but, unlike before, the LEA always knows what to expect. All expectations for records and interviews are laid out in advance.

The purpose of this new monitoring procedure, although still "compliance" in intent, departs significantly from before. Because the REC and the LEAs are bound first and foremost by a helping relationship, technical assistance prevades the monitoring context. REC staff know the LEA special education programs, which saves a great deal of time. LEA staff are more open about their operation because they know their monitors and they know that the REC staff knows their programs nearly as well as they do. After all, as one superintendent put it, "We've been taking their advice all along."

Undoubtedly, the greatest advantage of REC monitoring is that the actual compliance visit is only a small part of the overall effort to comply. Because REC staff are available locally, and because their primary job is to help LEAs comply, efforts toward this goal are ongoing. For example, REC special education staff are consulted by various committees in the LEAs when placement decisions for exceptional students are made. The REC coordinator noted that "This way, decisions are monitored, not just approved." Along this same line, a superintendent pointed out that districts can consult with the REC regarding programmatic decisions they are considering. A local director said she reviews the proposed action with REC staff and they say, "This will fly or this will not fly."

When the REC began to gear up for its new monitoring role, it had the advantage of having a considerable amount of experience within the agency at blending technical assistance and monitoring. The Title I coordinator has been operating under this framework for quite some time. He helps LEAs prepare Title I proposals; reviews them and recommends acceptance to DPI, where final approval is made; and monitors the implementation of the plan once it is approved. And, of course, he helps LEAs implement their programs on an ongoing basis. He believes in the idea of combining technical assistance and monitoring because, "You can do more with a helping hand than a heavy hand."

As well as exceptional programs monitoring has worked so far, it has not been without its trade-offs. Where before the REC coordinator helped LEAs prepare and carry out their compliance plans, now she does much less of this because she is tied up with monitoring. LEAs have had to rely on their capabilities a lot more lately. What used to be monthly meetings with local directors happen not nearly as often now because, again, the REC is busy with monitoring. Moreover, what time is available for consulation tends to be spent with administrators and not with teachers. Some customary forms of consultation have had to be reduced in frequency; administrative consultation has become the dominant activity.

The REC coordinator has additional concerns about the compliance monitoring process: the formal part, the site visits. Given the timeframe (10 LEAs in one school year) and the resources available to do the job, she is concerned that she is not spending enough time on the things that count. The arrangement only allows time to see "just that services exist." She has little time to assess quality. "Obviously, a lot gets left undone, you can't monitor everything." But, remember that the actual compliance visit is only a small part of what amounts to on-going monitoring.

IDENTIFYING AND PROCESSING HANDICAPPED STUDENTS

All educators have some familiarity with what is usually termed the IEP process: referral, identification, the establishment of a student's committee, screening and evaluation, placement in the least restrictive environment, the development of the IEP, parental participation in the process, the review of the IEP, and procedural due process protective of the rights of the handicapped student and his/her parents. We seek in this section to describe this process and provide a view of how the Seaside LEAs undertake it.

Referral and Identification

The process begins with a referral by a teacher and, sometimes, a parent of a student to a committee consisting of the building principal, special and regular education teachers, and a psychologist. This committee, the school-based committee, considers the available data and determines whether to initiate a request for a psychological evaluation.

If a teacher recognizes a need for assistance with a child, he/she can request an observation of the child by the principal, the director of programs for exceptional children, a teacher of exceptional children, or appropriate support services personnel. This step is skipped if sufficient documentation exists that the child is having problems. If a child is observed, a written description of his/her behavior and academic skills is prepared.

However, much in the way of preliminary observations and regular classroom adaptations can occur prior to the formal referral. Many of the regular classroom teachers interviewed said that, prior to submitting a formal referral, they attempt to modify their approaches to accommodate the student. For example, they may move the student to a different seat, try a different teaching procedure, or employ different or adapted materials. Anecdotal or informal observations are made relative to the effectiveness of such accommodations. If they are ineffective, the principal will schedule the student's case for deliberation by the school-based committee.

Some mildly handicapped students do receive kindergarten screening along with other students of their age. But because of a lack of sophisticated screening instruments and procedures, only about 15 percent of all mildly handicapped students are identified prior to first grade. In most cases, follow-up referrals and evaluations are not done until first grade and sometimes later. Thus, services ordinarily don't begin until the student is 6 or 7 years old.

Lower functioning students are often identified prior to entering school by the Developmental Evaluation Clinic. They also may have attended the Child Development Center operated through Community Mental Health services and so by-pass the school-based referral process as they are placed in public school programs for moderately or severely handicapped students. However, teachers whose students come from very poor homes say that nearly half of their moderately retarded students were not identified by, nor did they participate in, such services prior to entering school. Instead, their disabilities went unattended until they became of school age.

Most mildly handicapped students, though, are referred at school age. The school-based committee determines upon this referral whether to request permission from the parent to conduct screening and evaluation. In some it is very difficult for the LEA to obtain parental permission for evaluation. One might safely assume that at least part of this lack of parent responsiveness is due to poverty- and awareness-related factors: no phone, no transportation, no forwarding address, and so on. Yet, a few parents believe that a referral for screening and evaluation reflects problems with the teacher, not their child. In still other instances, the student may be playing both ends against the middle, convincing Mom or Dad that the "teacher is crazy." Indeed, some kids may well be handicapped, but they're not without their share of ingenuity. In the extreme cases, in which parents refuse to allow their child to be evaluated, the LEAs are very reluctant to call for a due process hearing (explained below). The LEAs position is that even if the hearing results in a decision against the parent, there is no reasonable way to force parents to accept services for their mildly handicapped child. The LEAs would rather try to convince parents informally than take legal action against them.

Screening and Evaluation

The aforementioned teacher observations and attempted accommodations before referral actually represent the first level of evaluation. Screening and in-depth evaluation represent the next two levels and are carried out in accordance with published state guidelines.

Usually, the building principal receives the formal referral, and, after discussing it with the referring teacher, he or she schedules a preliminary conference with the referring teacher, the appropriate special education teacher, and the psychologist. In each school, these individuals form the core of the school-based committee, described in more depth in the following section, "Placement."

The next step is usually some form of screening such as the administration of achievement tests. Typically, the special education teacher will conduct the screening, and, upon compiling the results, he or she presents them to the school-based committee which decides if and when an in-depth psychological evaluation should be conducted.

When either screening or evaluation requires the administration of instruments, interviews, or other procedures used selectively with an individual student, i.e., not given to everyone in the child's class, grade or school, written parental permission must be obtained. Within 30 calendar days of the referral, the LEA is required to send parents a written request for permission to evaluate.

State guidelines call for the capability to provide the following types of evaluations: educational, psychological, adaptive behavior, psychomotor, vision and hearing, medical, speech and language development, audiological, opthalmological, and vocational evaluation. In addition, the guidelines require that tests and other evaluation materials must be validated for the specific purpose for which they are to be used. Further, all tests and evaluation materials and procedures utilized for the purposes of evaluation and placement of children with special needs are to be selected and administered so as not to be racially or culturally discriminatory.

Although we will describe special education categorical areas in a later section, three of these areas require some coverage at this juncture because there are specific state requirements concerning the evaluation of students for potential placement in these programs.

Mentally Handicapped

Evaluation should provide information to indicate whether the child needs a program for the educable mentally handicapped (EMH) or the trainable mentally handicapped (TMH). The state stipulates that IQ ranges for placement in EMH programs is 50-69 and for TMH, 39-49.

State guidelines also call for an assessment of the student's adaptive behavior. However, the assessment of adaptive skills requires parental input that is often difficult to obtain. As we will see, parents sometimes have no phone, no transportation; and they readily acquiesce to educators' professional "aura" in such a way that the validity of their answers could be questionable. Also, they simply may not understand the questions.

Learning Disabilities

The diagnosis of a potential LD student involves four essential steps: determining the pupil's current intellectual functioning, calculating expected achievement on the basis of intellectual functioning, determining the discrepancy between expected and actual academic performance, and analyzing the achievement discrepancy through test-item analysis procedures. All four steps should be completed before the pupil can be identified as LD.

All LD students should have a written report that indicates the basis for determining that a learning disability exists and the relevant behavior noted during the assessment of the child. The school-based committee is required to identify a multidisciplinary team consisting of the regular teacher, a learning disabilities teacher, and at least one person qualified by DPI to conduct individual diagnostic examinations such as a school psychologist, speech-language pathologist, or a remedial reading teacher. Each multidisciplinary team member certifies in writing whether the report reflects his or her conclusions. If it does not, the team member must submit a separate statement presenting them.

Emotionally Handicapped

Before placement a psychological or psychiatric evaluation, educational evaluation, and adaptive behavior evaluation must be conducted. No other categorical area places as much responsibility on the psychologist relative to the interpretation of these measures. He or she must gather data sufficient enough to enable a judgment as to the inappropriateness or inadequacy of the student's behavior in the educational context. Although that behavior's duration, frequency, and/or intensity may be measurable, the ultimate judgment of course is to what extent any one or combination of these dimensions renders a behavior inappropriate or inadequate. The state's definition and, indeed, the identical P.L. 94-142 definition do not provide an answer. Thus, the psychologist, and ultimately the committee, must supply their own criteria of inappropriateness and inadequacy.

Implementing these state evaluation policies presents some difficulties. There are the typical span-of-time problems. Conceivably, the longest span between parental permission to test and placement allowable by state regulations is 30 days. Of course, placement is contingent on the full-scale evaluation that, according to some, can take as long as three months between the time permission to test is granted and the evaluation is completed.

There are other time-related difficulties as well. Availability of related service personnel such as occupational and physical therapists is often tenuous at best. Those who are available have full schedules weeks in advance. Obtaining parental involvement in IEP development can exceed the 30-day limit and LEAs who attempt contact at least three times often continue the process without parental permission for the sake of the student's program. Also, some students require more team members, resulting in a multiplication of scheduling difficulties by each additional committee member. Finally, new state directives tend to exacerbate the lengthiness of the evaluation process. The new requirement for evaluating LD students, an item-analysis of the results of a standardized achievement test (most often the Woodcock-Johnson Psychoeducational Battery), trades the increased value of the test to teachers in exchange for the additional time necessary to item-analyze it. Another problem is deciding whether the responsibility of doing the work rests with the psychologist or the teacher.

Problems also can emerge when LEAs contract or arrange with other agencies to conduct evaluations. Although the Developmental Evaluation Center is viewed as quite facilitative in providing some free evaluation and follow-up services, its personnel can be spread only so thinly. Community Mental Health, slashed in budget, personnel, and services itself, is open only twice a week and charges $300 for its services if a referral is from a parent and $100 if from a school. Even with a sliding scale, this charge limits the market of parents for whom services are accessible. Schools will sometimes initiate referrals in lieu of parents; however, every additional case costs more in terms of time than money.

Placement in Special Education Programs

Subsequent to the referral, identification, and evaluation of a handicapped student, the school-based committee recommends placement to its administrative counterpart in the particular LEA, the administrative placement committee. The functions and responsibilities of these two committees are discussed below.

School-Based Committee

The school-based committee is responsible for receiving referrals, involving parents in the planning process, obtaining parental permission for assessment, initiating screening and evaluation procedures, evaluating information, and seeing that an individualized education program (IEP) is developed and reevaluated annually.

Regarding placement decisions, members of the school-based committee are: the principal (or designee) as chairperson, the referring teacher, the director of programs for exceptional children (or designee), the teacher of exceptional children, a psychologist, and, depending on the student's needs, a social worker, a guidance counselor, a speech therapist, a hearing specialist, a physician or school nurse, a physical therapist, an occupational therapist, and the parent(s). With the exception of the first four personnel roles, these individuals rarely take part in committee activities for a number of reasons that will be examined throughout the remainder of our story.

Prior to making a placement decision, school-based committees review and interpret the results of the evaluation data. Within 30 calendar days after the diagnosis and evaluation are completed, the committee attempts to schedule a conference with the parent(s) to interpret the results of the evaluation. State regulations require the conference to be held no later than 30 calendar days. This conference may be waived by the parent, and often is.

Within 15 calendar days after the evaluation is completed, the student's parent(s) is sent a summary of the results and findings along with a proposed placement for meeting the student's educational needs. This information is also forwarded to the administrative placement committee.

Administrative Placement Committee

The administrative placement committee makes all final decisions regarding placement of students in programs for exceptional children. It is responsible for receiving and reviewing all information collected and considered by the school-based committee and for reviewing and approving the recommendation of the school-based committee regarding placement of a student in a special program. The committee is also responsible for ensuring compliance with due process procedures and mediating any initial disputes concerning the identification and placement of a student in a program for exceptional children. These due process procedures are provided in writing to the parents.

The members of an LEA's administrative placement committee are the following: the director of programs for exceptional children, the chairperson of the school-based committee, the LEA superintendent or designee, a school psychologist, and other personnel appropriate to the student's needs. The committee is required to have at least one member of the same race and sex as the student being considered for special education placement.

Considerations in the Placement Process

Three considerations pertain with respect to the foregoing descriptions of the placement committees and process. First, LEAs have in some cases found it more feasible to combine their school-based and administrative placement committees. We will describe how they've done this and the reasons why. Also, we will describe the problem of involving necessary related service personnel in the placement process. Third, we'll look at the aforementioned notice of the right to appeal and due process sent to parents as prescribed by state law and P.L. 94-142.

Combining Committees. In 1981, the state amended its regulations to allow LEAs to combine their committees. Those that chose to do so typically combined the school-based and administrative placement committees, and some combined these and the smaller, working IEP committee. The role, function, and effectiveness of this last committee will be described under the heading of "IEP Development," which follows the present discussion.

LEAs must request, and describe reasons and procedures for this combination in writing to the state department. Most LEAs feel two committees are unnecessary; one would save time and paperwork. Some teachers report that the process of recommending placement to the administrative committee was the "most hated" of all the IEP-related activities because of the time-consuming nature of the process.

However, some LEAs combine when they should not. These LEAs may be too spread out with respect to the locations of their buildings. Without the administrative committee, necessary schedule coordination of non-building based committee members is lacking. It is not unusual for the local special education director to be expected to be literally in two (or more) places at the same time.

Another possible pitfall in committee combinations relates to one of the roles of the administrative committee: mediation of disputes. Although, in reality, no substantive differences result from combining school-based and administrative commitees, i.e., parents have appeal rights regardless of committee structures, one still would expect that a separate body might more effectively enable disputing parties to reach an accord. Now, in essence, the source of the dispute and the source of mediation can be one and the same.

One other problem with these combinations again relates to the administrative committee's role, this time with regard to cross-county collaborative efforts. In one county, for example, aside from disputes, the only other point at which the administrative committee is activated is when the necessity for interagency services, e.g., school and community mental health, arises. If the LEA were to combine committees, more work in such instances would be required of the superintendent or of the school-based committee, or both--exacerbating already thinly spread resources.

Several LEAs nevertheless have combined their committees resulting in varied configural patterns. One LEA, for example, has a district-wide school-based committee. Standing members are the local special education director and the psychologist. Depending on the student's needs, other members range from the regular teacher, special teacher, speech therapist, and sometimes the principal who typically designates chairperson responsibilities to the local special education director.

In another LEA, the committees have remained discrete, yet combined in an informal sense. According to one teacher, various combinations of the counselor, principal, special education teacher, paraprofessional, local special education director, and regular classroom teacher are drawn together to serve as school-based, administrative placement, or IEP committee depending on the student's needs and the required committee task.

Related Service Personnel. Throughout the past discussion on the placement committees, who comprises them, and how they work, mention has been made of various professionals who may or may not be needed depending on individual student needs. These professionals are "related service" personnel: occupational and physical therapists, social workers, physicians, etc. We will see later in the case that these personnel are in short supply for a number of reasons. It follows that those who are on board, working for the schools or for other agencies, are so strapped for time that arranging for their presence on the placement committees is a nearly impossible task. Thus, students, especially lower functioning ones, often do not have the benefit of having their evaluations conducted by a well-represented multidisciplinary team nor do they benefit from the input of related service personnel during the placement decision and program planning stages of the IEP process.

Informing Parents of Their Rights. One effect of the lack of representation of related service personnel on the placement committee is that some of these personnel, e.g., a social worker, can serve as valuable assistants to the schools in terms of parent involvement. While we will address the degree of their involvement later in this section, for now we'd like to discuss briefly the effectiveness of notices to parents concerning their rights to appeal and due process. As mentioned, when parents are sent written requests to evaluate or place their children, they also receive from the school a written statement of their rights to appeal placement and programming decisions and their rights to procedural due process. According to both regular and special educators, this statement needs to be written more clearly. Evidently, they're right. When asked whether she understood her right to appeal placement decisions, one parent said that she didn't have the "paper anymore" and couldn't remember what it said. In general, it appears that the higher income parents are able to understand their rights whereas lower income parents do not. The way in which notice is given, then, tends to be much more disadvantageous to the lower income parents. Further exacerbating the matter is the fact that many low-income parents, especially parents of black and migrant students, are thankful that their kids are in school. The right to an appropriate education in the least restrictive environment is not one they are ready to fight for yet.

Continuum of Placement Options

Following is a description of the continuum of programs and services that should be available to children with special needs.

Regular Classroom. Some mildly handicapped students can be educated in the regular classrooms on a full-time basis. In such a case the teacher will individualize the program to meet their needs. The teacher may need periodic consultative services from resource persons if they are available.

Regular Classroom Program with Supportive Services. At this level of the continuum, students remain with their regular teacher for most of their academic instruction. However, available supportive personnel may work with the child in the regular classroom or may have him/her leave the regular class to go to another setting for service.

Resource Room. This type of service ranges from 45 minutes to an hour or for one class period a day to most of the day except for those periods of time when the student is returned to the regular classroom for art, physical education, etc.

The most common resource room arrangement is in terms of a categorical area related to student identification, such as an LD resource room, or an EMH resource room. Currently, however, the state and some of the Seaside LEAs are moving toward the use of "noncategorical" resource rooms that can serve combinations of LD, EMH, and emotionally handicapped students. The idea is responsive to the predicament many LEAs experience in which the number of students in particular categorical areas is less than the number that can be served cost-efficiently in a separate categorical program.

Self-Contained Classroom. Some students have educational needs that cannot be met by any of the previously described program alternatives. Their needs require major modifications in curriculum, approach, and methodology. Some of these students may be returned to a less restrictive setting whenever the educational objectives for the student have been met. Self-contained classrooms for the most part are located in a school building where classes for regular students are being held.

Special Day School. Some special programs are located in separate buildings or schools. A student typically is placed in a special day school only when his/her needs cannot be met in a regular school environment. A clear educational advantage for this arrangement must be documented prior to the placement of a child in this program. Developmental day centers and Head Start programs provide training and socialization opportunities to children who have demonstrated a significant lag in one or more areas of development and cannot presently be served in the public schools. Individualized education programs must be written for each child.

Hospital/Home Services. Any student who is expected to be confined for four weeks or longer to a hospital or at home for treatment or for a period of convalescence is eligible for this program. Any student who is disabled to the degree that it is impossible or medically inadvisable for him/her to attend public school even with the provision of special classes and transportation is eligible for home/hospital services. The student should be expected to be away from the classroom for minimum of four weeks, and the medical statement should state the nature and extent of the handicap, the physical or psychological limitations under which the student can operate successfully, and the anticipated length of time he/she is expected to be incapacitated. Children eligible for hospital/home services are to be given instruction based upon their individualized educational program from three to five hours per week unless prohibited for medical reasons.

Residential Centers. Residential centers provide educational diagnosis and treatment/education to students who cannot be provided for in any other available appropriate program. Such programs include education for the hearing impaired, visually impaired, severely or profoundly retarded, emotionally handicapped and autistic. The state's Department of Human Resources, considered an LEA by the state, administers these residential facilities. It also funds community-based mental retardation and psychiatric centers that provide school-based students with related services, treatment, and therapy.

Continuum of Communication Programs. Speech, language and hearing services may appear at any level of the continuum and offer program or service alternatives. A continuum of program and services model for children with speech, language and hearing impairments includes a communication development program, a communication deviations program, and a communication disorders program. Services then should be available for mildly as well as more seriously handicapped students.

Student-Placement Mismatches

As we shall see, variants in the appropriate match between handicapped student and service option do occur. Perhaps, however, some of these options are more susceptible to such variation than others. Resource room placement, for example, assumes students, such as those who are mildly mentally retarded, mildly emotionally handicapped, and learning disabled, need regular classroom experiences as much as special materials or instruction approaches. One resource room teacher told us that about half of her students needed, at minimum, more than 45 minutes of resource room instruction a day, and ideally some should be in self-contained classrooms. Another resource teacher felt that the spirit of P.L. 94-142 and the state's Powell Bill has resulted in many students actually being denied necessary services due to an inordinate percentage of time spent in regular classroom placements.

As mentioned, some LEAs appear to be moving toward the noncategorical resource room concept. Here, the major incentive is fiscal; the major drawbacks are, again, misplaced students and misplaced special education teachers. With respect to fiscal incentives, the 1982-83 school year will bring what has been termed an "aggregate cap" of 15 percent, explained earlier in the case. It is clear that this arrangment will encourage noncategorical programs.

However, increasing concern has been voiced already with respect to the quality of categorical teachers. Enter now cross-categorical training. One wonders if the institutions of higher education will be able to keep pace with the quality demands incurred when teacher preparation entails more than one categorical area of focus.

In addition, the rate at which the Seaside LEAs move toward non-categorical programs will have implications for the quality they can expect in the teachers who staff those programs. Of the three universities in the state that currently offer cross-categorical[1] certification programs, the closest one to the area is 300 miles away, as the crow flies. The closest programs do not yet offer this certification, and an area training program that could have offered one just lost its accreditation. Thus, in addition to the concerns area LEAs have relative to quality noncategorical teachers, LEAs might experience difficulties recruiting any non-categorical teachers until more proximate certification programs are in place. Whereas noncategorical resource rooms, if properly staffed, can ameliorate the problem of misplacements with regard to some mildly handicapped students, the plight of EMH, TMH, and severely handicapped students remains a concern to several of the LEAs. Severely handicapped students who have not been placed in programs in residential facilities appear to be prone to the majority of no-win placement decisions LEA administrators are forced to make. An 11-year-old girl functioning at a 6-month developmental level (profound retardation) is placed in a TMH class out of necessity. It's the only option save placement in an institution. Sometimes, EMH and TMH students are placed together in one program because neither group alone is of a sufficient prevalence to warrant a separate program.

In the main, LEAs make do with available resources and intractable contexts in which they must operate. Sadly, predictable solutions do not emerge. Yet one common denominator to getting the best out of slim pickin's could be termed climate--the underlying focus of the following discussion.

LEA Approaches to Least Restrictive Environment Education

What is the least restrictive environment? A frequent answer, and one not without validity, is that it's idiosyncratic to the particular handicapped student's needs. The point can best be illustrated by examples; five will be provided. The first is about an innovative approach to overcoming the problems of scheduling mainstreamed handicapped students called "Building Blocks." The second, "The Crazy House," tells about the difficulties of integrating TMH students and programs in regular school buildings. The third, "Homeward Bound," tells about the trade-offs inherent in placements in programs that are miles from the student's home district. The fourth is a story about some students who skipped class, but for reasons other than skullduggery; it's called "The Band Room." Last, we share two vignettes that illustrate the best and the worst of relationships bearing on LRE education at the building level; the story's called "Climatic Change." We think these stories can give the reader a feel for the complexities and considerations implicit in LRE placements as implemented by the Seaside LEAs.

---

[1] Although for administrative program purposes, the term used is "non-categorical," for teacher training and state certification purposes, the term is "cross-categorical."

Building Blocks

During a regular school day some regular classroom teachers wave hello and good-bye to nearly 90 percent of their students. Students move in and out of different classrooms for resource room instruction, Title I services, gifted education, speech therapy, and/or migrant education. This movement can occur at different times of the day for different students, and for different amounts of time per student and per service. The teacher is no doubt overwhelmed and understandably short on patience. The principal, who must see "the big picture" in terms of student scheduling in the building, can't feel much better about the situation. His or her hands are tied. These services are necessary; they are public policy; the law says they must be implemented.

Enter the Block Program. This is an innovation picked up by several of the Seaside LEAs several years ago. Essentially, mainstreamed handicapped students move daily from their regular classrooms to the resource room in "blocks" at one time. In large school buildings, all mainstreamed students in individual classes or grades leave their classroom(s) at a prescribed time for 45 minutes or so of work in the resource room. In smaller buildings with fewer students, students from several grades may leave their classrooms for resource room instruction.

The concept struck most regular classroom teachers favorably. The stigma centering around a student who leaves for "special ed" alone each day is reduced. In some buildings, mainstreamed, migrant, and Title I students might all leave at the same time for their respective services--there's power in numbers; no one gets singled out. Another of the regular educators' concerns soothed by the Block Program is that handicapped students miss fewer important lessons while in the resource room since all eligible students leave and return together. The teacher can plan regular classroom instruction for these students more easily.

A related benefit befalls the students who remain with that teacher. He/she plans and delivers enrichment activities. Critics of the LRE concept point to the fact that it is the nonhandicapped students who often pay the price for increased attention to handicapped students. The Block Program can benefit both groups.

The program is alive in some LEAs, deceased in others. The reasons are not clear. Under the Block Program, some of the smaller schools had to schedule several different grade levels together in the resource room at one time. Apparently some resource room teachers could not accommodate their teaching methods to a wide age-range of students. Resource room teachers in larger buildings did not encounter such age disparities, but sheer numbers of students in the program emerged as a problem for them.

It would appear that the idea is one more readily embraced by regular classroom teachers than by resource teachers.

The Crazy House

Recently the Governor's Advocacy Council has been encouraging the return of lower functioning handicapped students from residential facilities to their home districts for services. Moderately handicapped students, for example, have been trickling back, and LEAs for the most part have been creating classrooms for them in regular school buildings. The idea is sound from an LRE perspective. The students at least are integrated with their peers.

Or are they merely in proximity to their same-age peers? TMH programs in some schools operate in prefab, modular structures in back of the main building. Other schools, also strapped for space, may locate the classroom in the basement. Nonhandicapped students see TMH students at unexpected times, by happenstance, as in the basement corridor or maybe in an assembly. Often, the school district is forced to make do, placing adolescent TMH students in its only available building--an elementary school. So, in these contexts, TMH students actually stand out more than they fit in because integration is pro forma only. The result here: nonhandicapped students call the TMH classroom the "crazy house."

Homeward Bound

The physical location of the best quality program for a specific student's needs also may create problems. As an administrator, what does one do, fiscal considerations aside, when such a program is located in another county or another state?

As is typically the case, one mulls over the trade-offs. Program X is a high-quality program. It is also 60 miles away. Johnny needs program X--his LRE. Ideally, one ranks program quality and appropriate match of student to program over all other considerations. Sounds good on the surface.

But let's dig deeper. The following drawbacks would lead an idealist, as well as a cynic, to question the worth of such a placement. The obvious disadvantage to a distant placement is bus time. Precious instructional time can be lost even if there are on-board instructional activities. A long bus ride means early departures from the home which can be disruptive to the family. Parental involvement in the program has to suffer given the distance factor alone.

Although the state provides necessary and sufficient reimbursement for student and parent transportation costs, close-to-home placements seem to be the more favorable component of the trade-off. The aforementioned effort necessary on the part of area teacher training programs to provide quality categorical and noncategorical teachers coupled with this local trend toward avoiding out-of-district placements can make the wish to be homeward bound come true.

The Band Room

Recall the story presented earlier entitled "Crazy House." It represents one of several situations related to us in which handicapped students were, in effect, set up to be stigmatized. Another example that may illustrate the problem more clearly took place in a junior high school. Because no space for an elementary level multihandicapped program was available in the two elementary buildings in the county, the program was set up in a seldom used wing of the junior high. Actually, the facility was quite adequate physically. It provided easy access to the band room which, when it wasn't in use, could be used as a utility room for the multihandicapped students. However, the multihandicapped students were isolated from appropriate age-peers and, further, from the junior high students. This did not stop several junior high students from visiting the room over the lunch hour occassionally to see what went on there. They got to know the handicapped students and the teacher, and one student in particular became intrigued with the program and indicated to the teacher that she was interested in pursuing a career in special education. It was not long before the student and her friends started visiting on a regular basis, including a time or two when they left a study hall to do so. On one occasion they were caught and the visits were permanently stopped. Prior to this event, the special teachers gave an open invitation to the other staff to visit the program, but no one came.

The point here is that an opportunity was missed to foster positive attitudes, certainly an important part of the LRE concept. What was a less than adequate placement could have become a very positive one. But because of a lack of understanding of the purpose of the program and, indeed, the goals of special education and P.L. 94-142, the multihandicapped program remained isolated from the rest of the school and, what may be even more important, the school from it. The special teacher and others in the Seaside area made the point that the misunderstading of their students by the regular students could be cleared up quite easily through positive contact experiences, but that the first steps would need to be taken with regular teachers, and, in this instance, these steps could have been taken--in the band room.

Climatic Change

What makes a difference in a given school insofar as the success or failure of LRE? One advocate for handicapped students told us that the personalities of, and atmosphere set by, administrators and teachers comprised the cutting edge. LRE is made or broken by these variables.

In a sense, a climate is created in every school building. It is a function of the leadership style of the building principal. This style, in turn, is predicated on unique combinations of innovative ideas that are sold to the building staff, regular assessments and use of teacher input, communication skills, and backbone, to name a few.

Further, the ways building staff use the best of their individual personalities contribute to this climatic condition under which schools operate and LRE is implemented, for better or worse. We'd like to present two vignettes--one better, one worse--to illustrate this complex, yet crucial variable of climate and how it affects the LRE.

The research team's first bit of information about one of the Seaside area's elementary schools was that the building had been condemned. Talk about climate! Yet, before long, we began to realize that three actors created the atmosphere for a highly workable, effective strategy for mainstreaming mildly handicapped students; they are: the principal, the regular classroom teacher, and the special education teacher.

The principal's leadership style is rich in reputation and substance. He is an active Phi Delta Kappa member, winning a national award several years ago. His substance, however, is of extreme import. He exerts strong leadership while always seeking the input of his staff, allowing them "ownership" regarding the operation of the school. He's instituted a grading policy schoolwide in which handicapped students receive the average of the grades given to them in a shared subject area, say arithmetic, by the regular and special classroom teachers. His leadership style also has made the Block Program successful when other principals have contributed to its failure. He's respected by his teachers--not just liked by them.

Whereas we cannot speak for all regular educators in the building, we can tell you about one third grade teacher with whom we talked. Her classroom looked like a broker's office. Students' work was all neatly stacked in appointed trays. Handicapped and nonhandicapped kids moved about freely but in a purposeful fashion--all responding to her lead, one that is well organized and well reflective of the work ethic.

Her special education counterpart was a personification of our earlier point concerning the role personalities play in to building climate. Not trained originally in special education, this former middle school teacher found herself in the Seaside area looking for work. Her husband's madness for fishing took them to this area, and soon thereafter she found herself working toward special education certification.

Her classroom also is poetry in motion--many stimulating materials and activities, plus a personality on her part as conducive to effectiveness with her students as well as with her colleagues and boss.

However, each alone does not a climate make. The interactions of the three, in terms of individuals and roles, predicts the true nature of a mainstreamed handicapped student's LRE. Flexibility, leadership, awareness, "people" skills, and plain old-fashioned hard work all contribute to the mix.

The mix can be sweet or sour; the latter being the case in our next vignette. Here, we talked with staff at another elementary school in which the opportunity for a positive, productive LRE went from slim to none, thanks in large part to ineffective scheduling and mainstreaming some EMH students into classrooms before they or their regular teachers were ready for it. Communication in this building was less than desirable; regular teachers had little input into IEPs and for the most part the

EMH resource room operated like a separate entity that had simply been placed in the building. The lack of many of the attributes described in the foregoing vignette set the stage for climate problems that, in the end, became stormy enough to end mainstreaming for EMH students in favor of a self-contained classroom.

Evidently, a few of the regular classroom teachers launched almost daily complaints about the inappropriateness of the mainstreaming that was taking place. The special education teacher, whose assignment was shifted after the closing of the classroom, could not win the teachers over. Nor could the principal calm them down. There was too much mainstreaming too soon and the principal was unable to handle the complaints or correct the situation. A bad situation got worse until it threatened what cohesiveness there was in the building. Finally, the principal found himself with few options. He had to do something. So, he traded the resource program for a self-contained program and the withdrawal of pressure that would not have been there in the first place if building climate had been more positive to start with.

The Individualized Educational Program

Upon a student's placement in a special education program, he/she already will have had a determination of current performance levels, specification of a placement option, and, if appropriate, the designation of a percent of time each day to be spent in regular classroom participation.

Planning, Writing, and Implementing the IEP

At this juncture, the school-based committee goes about the business of developing the remaining components of the student's program plan either as a total group, or more often than not, by assigning its regular and special education teachers the responsibility as a subcommittee called the "IEP committee." Whereas the state regulations call for the involvement of all school-based committee members, the special education teacher in most cases actually writes the remaining components with varying degrees of regular teacher input.

With regard to mildly handicapped students, the regular classroom teacher many times provides welcome assistance. For example, he or she might add objectives to the IEP during its development. These inputs can enable better continuity between regular and special education programs; the lack of them leads to discontinuity.

This continuity in large measure predicts the ease and propriety with which the IEP is planned, written, and used. The task requires the right climate. When special education teachers and building principals have the interpersonal skills and leadership styles necessary and sufficient to overcome the "crazy house" view of special education, a less stigmatizing, more accepting climate is in place. Such a climate stems from attitudes such as "they're our kids, we're all responsible," as one principal put it. Within this climate, all teachers can become advocates for students. The students benefit when common goals are encouraged by leadership.

Other things can foster a positive climate as well. For example, regular teachers and resource teachers in a few districts base their IEP programming on an objectives-based curriculum. It has become a common denominator for shared responsibilities. Administrators say that it helps if the special educator "hustles," works hard, and is perceived that way by colleagues. Fortunately, the Seaside area has its fair share of these teachers as well as building principals who support them.

Parent Participation

The state requires LEAs to insure that one or both of the parents or guardians of the exceptional child are afforded the opportunity to participate in planning, writing, and implementing the IEP. The Seaside LEAs experience their share of difficulties in involving parents in the IEP process. The general rule is that the district must document three attempts to involve the parent in the IEP meeting. If attempts fail to get the parent involved, the district is authorized to proceed with the development of the IEP. So, while parental permission is required for evaluation and placement of the child, it is not required for IEP development of the child, it is not required for IEP development if the district has made three attempts to obtain it. Even so, some districts go beyond state requirements for parental involvement. One district requires four documented attempts to involve parents. Other districts require that all IEPs be signed by parents. In these cases, teachers are sent to the homes of parents who could not or would not attend the IEP planning session. Some parents have neither phone nor transportation. Others fear the establishment; still others believe that "teacher knows best." Some districts estimate that more than a third of the parents who won't come to the IEP meeting declind participation because they feel inadequate in front of school personnel. When asked what she'd do if she didn't agree with the proposed IEP, a parent of a TMH student replied, "I wouldn't know."

Estimates of parental attendance at IEP meetings vary with the type of disability and the particular LEA. Estimates of attendance for parents of gifted and talented students run at or near 100 percent. Attendance estimates for all areas of exceptionality are at about 75 percent (most often it is the child's mother who attends). The rate of attendance for parents of EMH children is the lowest, running at 50 percent. However, some districts, particularly wealthier districts which have higher parental awareness levels and home/school coordinators, can boast of attendance rates across all disability areas that are over 90 percent.

The REC and the schools continue to confront the general problem of parental awareness; much of it is attributable to disadvantaged conditions. The basic strategy of the REC is to exploit any and all opportunities to increase awareness. Workshops are conducted in an effort to actively involve parents. Parent programs such as the "make-it, take-it" program described earlier are instituted from time to time. LEAs in some cases will work closely with Community Mental Health social workers who not only act as liaisons or buffers between home and school, but also as sources of insight into the impact poverty brings to bear on some families and their handicapped children. Results are slow but encouraging. For example, more parents are beginning to refer their children. More are showing an interest in program planning.

But, there's still a long way to go. Some teachers believe parents don't know of their right to appeal any aspect of the referral, placement or instructional process despite formal notification of those rights. One special education teacher explained that his district's written notification of rights is inadequate for many parents. Some parents don't care, according to another teacher; others wouldn't understand even if they were told.

Review of the Individualized Education Program

The individualized education program must be reviewed at least annually with necessary changes made. The student's parent(s) or guardian(s) are invited to participate in the review. Many of the LEAs handle the annual reviews just like parent conferences. They usually conduct them toward the end of the school year. Parents of handicapped and nonhandicapped students then participate in these annual conferences. Such an approach singles out no one and helps reduce stigma.

Procedural Due Process

The final part of the IEP process involves the protective safeguards afforded to the handicapped student and his/her parents. Prior written notice must be given to parents a reasonable time before the local education agency proposes to initiate or change the identification, evaluation, or educational placement of the child. It must provide a full explanation of procedural safeguards to parental rights including consent, hearing rights, an independent educational evaluation, protection in evaluation procedures, placement in the least restrictive environment, and confidentiality of student records. As mentioned, when one is faced with informing parents of these in writing, it is not easy to do so in a clear fashion. Further, many of the parents are turned away by ambiguous, legalistic language. Thus, parental awareness of their rights and responsibilities is understandably incomplete.

The parents of a child with special needs have the right to obtain an independent evaluation of their child by a qualified examiner who is not employed by the LEA. The evaluation is to be conducted at public expense if the parents disagree with evaluation results obtained by the LEA. Public expense means that the local education agency either pays for the full cost of the evaluation or insures that the evaluation is provided at no cost to the parents. Evaluations are obtained through Community Mental Health or the Developmental Evaluation Center.

LEAs have attempted to arrange with these agencies independent evaluations for parents who have sought them. The aforementioned payment schemes have been employed. In most cases, evaluations have been less expensive, but not altogether free.

Hearings

The local education agency must keep a list of the persons who serve as hearing officers, including the qualifications of each person to serve as a hearing officer. According to the state's special education director, there have been only 30 due process hearings statewide between 1978 and 1981. There have been six hearings in the Seaside area (including the 1981-82 school year). The LEA came out on top in four of the six hearings. In the two hearings decided in favor of the parents, only one was appealed; it resultd in a civil court case which was decided in favor of the parents. According to local administrators, the combination of local superintendents who "would not let programs slide" and few pockets of verbal, militant parents account for fewer due process hearings than might otherwise occur. Perhaps one local director of special education painted the picture best, saying that when parents "squawk," we try to make them happy, yet not depart from the law.

THE NATURE OF SPECIAL EDUCATION PROGRAMS AND STUDENTS

In this section we review the various categorical programs in place in the Seaside LEAs and examine the ways in which students are placed in them.

Categorical Programs

The Seaside LEAs provide categorical programs in 14 areas. We shall review 10 of those and in addition, the Bennie B. class, a mechanism for serving assaultive, adjudicated youth. Deaf-Blind, Severely Handicapped, and Other Health Impairments are included under the rubric, Multiply Handicapped. Speech Impaired will be discussed as a related/support service in a later section of the same title.

Learning Disabilities

Who are the learning disabled? The Seaside LEAs are not the only ones grappling with this question. The national debate concerning how best to identify these students rages on.

This state, like many others, requires a team approach that documents a discrepancy between current achievement levels and intelligence. The discrepancy must exist when the student has been provided with learning experiences appropriate for his/her age and ability level but has not shown satisfactory progress in one or more of the following areas: oral expression, listening comprehension, written expression, basic reading skills (decoding), reading comprehension, mathematical calculation, or mathematical reasoning. The term LD does not include students with a severe discrepancy between ability and achievement that is primarily the result of any of the following: a visual, hearing, motor handicap; mental retardation; emotional disturbance; or environmental, cultural, or economic disadvantage. Team members include the student's regular classroom teacher, the LD teacher, a psychologist, and, if appropriate, a speech therapist and remedial reading teacher. The team is required to submit a written report of the diagnostic report and placement decision to the School-Based Committee.

Despite a fairly elaborate four-step evaluation procedures, the question of who are the learning disabled remains somewhat of a mystery. Regular and special educators alike agree on at least two premises related to the question. First, LD is a matter of degree and some students simply fall between the cracks. Since the state's directors of special education and Title I clarified eligibility with Washington two years ago with respect to joint special education and Title I services, fewer students have taken this tumble. Secondly, the exclusion of students from disadvantaged environments in the LD definition is untenable here given the widespread poverty. Thus, another trade-off has been invoked: preservation of the supposed homogeneity of the learning disabled population has been exchanged for a higher probability of using the services of the program area to benefit more students--a worthy trade-off indeed, and one characteristic of Seaside attempts to use whatever means are available to them to serve as many students as possible.

The resultant mix is not without pragmatic service delivery concerns, however. While the resource room is the predominant service delivery option, many regular and special educators believe some LD students would benefit more by self-contained placements. In the case of LD students, social integration is not the problem; it's the academic deficiencies that cause both groups of teachers the greatest concern. Thus, at least a few LEAs have provided self-contained classroom facilities, usually mixing LD students with others such as emotionally handicapped (EH) students.

Another concern is the inappropriate usage of available LD services. For example, some LEAs have begun to be extremely cautious in labeling students as mildly retarded. For some students, kindergarten screening might indicate possible retardation. Yet, there is the tendency to wait a year for formal diagnosis. In some cases the student in question is placed in an LD program as an interim placement. Although this is a laudable alternative to an EMH placement, it places a strain on the LD program. But, when the consequences are considered, this is certainly better than a misdiagnosis of EMH.

Educable Mentally Handicapped

Educable Mentally Handicapped (EMH) students are identified according to three indicators: intellectual levels in the mild range of mental retardation, deficiencies in adaptive behavior as measured by the *Vineland Social Maturity Scale*, and a flat profile of academic achievement.

Most administrators have indicated that EMH enrollments have been declining steadily over the past several years. Typical reasons offered include better teachers, more qualified psychologists, more precise identification procedures, and early childhood screening and intervention.

Yet, it is also clear that the practices involved in EMH identification have tended to result in a disproportionate number of black students in these programs. This overrepresentation is not limited to the Seaside area or even to this state. Indeed, it is national issue that has resulted in increasing diagnostic caution on the part of practitioners. So, while teachers and psychologists may be getting better, there is little doubt that they are more cautious. The push toward early childhood programs is still basically just a push. The Developmental Evaluation Center, a related service agency discussed in the section, "Related Services," does provide preschool screening, but does not provide educational programs. Three Child Development Centers, funded by Community Mental Health and the Developmental Disabilities Council, serve the entire region. However, EMH children are rarely screened or served through these agencies. Thus, caution as opposed to higher quality practices better explains the decline in EMH identification.

Services for those students who are diagnosed as EMH are primarily in resource rooms. Yet some LEAs do provide self-contained EMH placements in which students may nevertheless eat lunch or engage in recess activities with their nonhandicapped peers.

One school recently shifted from resource room to self-contained EMH services. Teachers made a concerted appeal to adminstrators, complaining that their classroom time was chewed up by EMH youngsters who required inordinate attention. Administrators conceded, a self-contained classroom was born, and the teachers were happy. More will be said concerning this shift from resource room to self-contained room in the section, "Identifying and Processing Handicapped Students."

As with LD students, identification practices with EMH students tend to result in heterogeneous groups. Increased caution in identification has resulted in a decline in the EMH population. Thus, many schools, faced with fewer numbers, must combine categorical areas in order to afford a teacher. EMH students have been placed with EH and LD students, and, in some cases, even Trainable Mentally Handicapped (TMH) students.

Gifted/Talented

Besides LD and EMH, the other high-prevalence categorical area is Gifted/Talented. The criteria for identification and placement into the program center around four areas: intelligence, achievement, grades, and behavioral characteristics. Achievement and IQ scores must be at the 96th percentile or above on standardized measures. The more subjective criteria, grades and characteristics, are based on the observations and conclusions of classroom teachers who must nominate students for potential placement usually around the second or third grade. These criteria weight the student's academic ability heavily. Students with extraordinary talent in the arts would need also to demonstrate similar academic talent to qualify for the program.

In addition to local identification for gifted services, there is also a statewide program involving the selection of students to attend the Governor's School for a six-week period during the summer. Concern has been raised in the Seaside area that local students could be at a disadvantage in competing for a slot since their performance is compared to students in wealthier parts of the state.

Gifted programs are of the resource room variety. Students attend for an hour three to five times a week. Some LEAs use the Block Program to streamline the flow of gifted students in and out the resource room by grade level. In fact, one school that discontinued the Block Program for mildly handicapped students is still using the scheduling system for gifted students.

Emotionally Handicapped

Students with emotional handicaps (EH) are identified using the same broad criteria set forth in P.L. 94-142, including the inability to learn that cannot be explained by intellectual, sensory, or medical problems. Students must demonstrate behaviors of sufficient duration and frequency so as to be inappropriate to, and inadequate for, placement in regular educational settings. Students must also demonstrate difficulties in building interpersonal relationships.

Such broad criteria place pressure on the school psychologist to make what essentially is a judgment call when diagnosing a student as EH. There is understandable reluctance to assign the label unless overwelming supportive evidence emerges. Even when such evidence leads to the diagnosis, we again see quite a range of student characteristics within self-contained EH classrooms, including students who are referred for distractibility to students whose emotional problems require psychiatric care and family counseling.

Eight of the state's teacher training institutions provide teacher certification programs, and although an exemplary classroom is in place in one Seaside district, none of these training institutions can be credited for the program's quality. The classroom is an "engineered" class based on the approach developed by Frank Hewett. Essentially, Hewett calls for a very fundamental classroom structure in which the room is subdivided into academic and non-academic areas. Each of these is further subdivided according to students' particular academic needs and leisure preferences. The teacher engineers the movement of the students in and out of these four areas at prescribed times, usually sequencing academic work and leisure activities in tandem throughout the day. The DPI brought Hewett in several years ago to help a teacher set up the program. That teacher's aide is the aide in the current classroom and helped with the cross-fertilization necessary to start and maintain the program. Exemplary programs are drawing cards and many of the area's educators have visited the program, some out of curiosity and others out of a desire to start similar classrooms in other schools and districts.

The "Bennie B." Class. As mentioned earlier, the state's district court in 1979 ruled in favor of four plaintiffs by declaring the state remiss in providing the necessary services for students under the age of 18 who are characterized as "violent and assaultive." To date, over 800 such students across the state, including one in the Seaside area have been identified.

The situation surrounding the Seaside student's status has already been discussed in an earlier section ("General Education Programs"). His release by the juvenile authorities without prior notice to the LEAs, set the stage for intensive collaboration among several agencies, spearheaded by the principal of the Alternative School.

Such collaborative efforts, albeit not of that magnitude, have been mandated as a result of the Bennie B. case. In general, schools nominate to area mental health centers children they believe are eligible for services supported by Willie M. funds. LEAs request informed consent from parents to conduct additional evaluations if needed. The state is notified regarding the number of children nominated and keeps an ongoing register of all identified Willie M. students. Community Mental Health staff are assigned to work with the LEA to provide educational (LEA) and treatment (CMH) services. Like the Alternative High School principal, LEAs typically take the initiative in such cases due to the lack of available CMH staff.

For children certified as being members of the Bennie B. class, schools are required to: provide special education services in compliance with an individualized education program; use data received through the evaluations conducted by the area mental health centers and other sources in writing the individualized education program in the area of education; and provide special education and/or related services as needed to certified Bennie B. class members who are located in the schools, group homes or special facilities, like the Alternative High School. The special programs may be provided in the group home or special facility. The decision as to the location of the program is determined jointly by the local board of education and the area mental health center with the local board of education making the final decision.

Local schools notify the state of the special education program being provided. The notification must contain the types and the duration of services, as well as any other information that the department deems relevant. The DPI will provides training to personnel who provide educational services to Bennie B. students.

The State Board of Education provides funds to local districts (regular allocation, special education add-on and federal plus $2000) to assist LEAs in providing special education to Willie M. students.

The state through the Division for Exceptional Children monitors local school administrative units and/or other facilities that are providing educational services to Bennie B. students to determine if the program is appropriate. In the Seaside region, the REC's Planning Specialist in the Exceptional Children area monitors services to Bennie B. students.

On paper, this sounds fine. Actually, the legislature divided the state into "zones"--some of which are receiving the funds called for in the mandate. The Seaside LEAs, however, are in an unfunded zone. This is forcing the LEAs in unfunded zones to drain precious dollars out of standard handicapped reimbursement funds. Basically, the legislature thinks it improper that the state must support services for these students. However, like all issues in a politically charged atmosphere, this one has its "carrot and stick." The judicial ruling in favor of Bennie B. comprises the stick. The carrot? Reducing out-of-state placements; they're a thorn in the side of the legislature. When students are sent to adjoining states for services, the costs incurred are difficult to justify. In the northeastern region of the state, for example, students with severe emotional problems have been sent in the past to a psychiatric hospital in a neighboring state for treatment. Local constituents whose tax dollars ultimately paid for those services pressed their representatives about the unavailability of in-state, less expensive alternatives. The legislature compromised and enacted the mandate.

Trainable Mentally Handicapped

Most of the area students in TMH programs are poor and, in the poorest counties, nearly all are black. They are identified for services on the basis of IQ scores at or below 55 accompained by deficits in adaptive skills. Most of these students owe their condition to cultural-familial retardation, not organic or genetic as is the case with a typical TMH population. Often, one or both parents are retarded. Many believe the condition itself is passed down through the generations. It's not, but the poverty is.

The earlier TMH students receive services, the higher the probability for functional, independent living. It is increasingly common to find children whose IQs have been increased from the 50's to the EMH and even low normal ranges as a result of early intervention procedures, including infant stimulation. Without a vehicle or the resources to provide anything that would approach such an intensity of service, the Seaside schools must take the TMH students when and how they get them. Many are not identified until they reach school age. Given the home conditions of many of the poorer students before and during their school careers, the best their teachers can hope for is to keep them from regressing, regardless of the quality of the TMH program.

Most TMH children are bused to a central location(s) for their education because the "add-on" state reimbursement scheme does not account for lower incidences of certain types of disabilities. Ninety-minute bus rides are not uncommon. Thus, even more precious instructional time is eaten away and the opportunity for the TMH program to affect the student's development is further diminished.

There are, however, some exemplary programs in place in the Seaside area. In one of the wealthier districts, for example, a secondary level TMH program is operated in a regular high school building. TMH students in this program are integrated with EMH and nonhandicapped students in the school's regular vocational education program. Because the LEA serves an area that is relatively wealthier, it does not have to contend with problems present in more disadvantaged areas.

Arranging for related services for TMH students is difficult for the Seaside LEAs. In the first place, less than adequate services are available; and, of those available, demand far exceeds supply. Because the state reimbursement mechanism does not account for how the severity of the handicap produces differences in the amount of related services needed, LEAs must fund related services from a fixed amount of dollars allocated to them on the basis of headcount alone.

Physically and Severely Handicapped Students

We briefly will discuss three categorical areas: physically handicapped, severely/multiply handicapped, and autistic. Prevalences in all three are low in the Seaside area. Identification is not difficult. Essentially, it must be documented that the disability adversely affects educational performance. It's a judgement call, in effect; and in many cases, students have been identified prior to reaching school age because the severity of their disabilities is so evident.

The low prevalence of physically handicapped students forces LEAs to place them in special education programs designed for severely or multiply handicapped students. For some severely involved students, such a placement is appropriate. For those whose disabilities are singular and/or more mild, LEAs provide regular classroom instruction with supplemental occupational or physical therapy when such services are available.

A physically handicapped student in the regular classroom requires much in the way of adaptation on the part of the regular educator. In a few cases, these are problems caused by the lack of building accessibility. In addition, a few teachers are somewhat taken aback by the student's appearance. They are afraid others will tease the student or that the student will have a seizure.

However, many regular classroom placements prove beneficial to the student, his peers, and his teacher. A home economics teacher in one of the Seaside area high schools told about the physically handicapped student placed in her classroom. She considered his placement in her classroom a challenge--a positive challenge. He wanted to learn to sew and she was as bound and determined to teach him as he was to learn. She adapted her normal approach to his disability--cerebral palsy with more involvement in the legs than in the upper body. He was quick to grasp the rudiments and, before long, he was replacing buttons on his shirts. One wonders how many of his nonhandicapped male peers performed this skill. One can well imagine the sense of accomplishment, from both the student's and the teacher's perspective.

Severely and multiply handicapped students represent similarly low-prevalence categorical areas. LEAs serve most of these students, i.e., severely retarded and deaf-blind students as well as students with two or more handicapping conditions, in collaboration with other agencies such as universities. In other cases, the student may be placed in a TMH classroom.

Autistic students, i.e., students who show disturbances reflected in developmental rates, speech-language, capacity to relate to others, or erratic, stereotypic behavior, also are served through multi-district or interagency collaborative arrangements. For example, one of the state's major universities offers a program for autistic students in which four LEAs participate. Soon, the state will pick up the cost of the program. For now, the university pays for the teacher and an aide, while the LEAs share the cost of an additional aide. This collaborative arrangement allows the LEAs to provide quality, appropriate services to another low-prevalence population of students. Without the arrangement, the LEA would have no choice but to place the students' in TMH classrooms. However, opportunities for this type of university-based program are rare. The campus is quite a distance from the Seaside area, and universities closer to the area have not been able to help.

Hearing and Visual Impairments

Students who are hearing impaired or deaf or are visually impaired or blind represent extremely low prevalence areas. None of the state's training programs offers these certification programs; no teachers of visually impaired or hearing impaired children are currently available in the Seaside area. The state has chosen a staff-development approach in facilitating services for these students. The state department conducts one-week summer institutes to train currently employed special education teachers to work with these students. These teachers receive three hours of course credit and provisional certification. Most often, LD teachers are involved in the education of these teachers who have been certified through thesesummer institutes. Hearing impaired children also attend regular classes and most often receive their services from both an LD teacher and a speech clinician. Students with more severe hearing and visual impairments who cannot be served through the above arrangement attend state residential facilities for the deaf or blind.

RELATED SERVICES

According to the state's rules and regulations, related services include transportation and the developmental, corrective, and support services necessary to assist handicapped students in benefitting from special education. They include speech therapy, audiology, psychological services, physical and occupational therapy, early identification and assessment, and medical services for diagnostic or evaluation purposes. Also included are school health services, school social work services, and parent counseling and training.

Of these, the major related services used by the Seaside LEAs are psychological services, physical therapy, occupational therapy, and speech therapy. Other related services such as audiological and preschool screening programs, and medical services are provided by Seaside area agencies operated by the Department of Human Resources (DHR). School social workers are also employed by DHR and can provide LEAs with assistance in contacting parents, as mentioned in the section, "Identifying and Processing Handicapped Students." Also mentioned briefly in that section were services related to parent counseling and training provided in the form of workshops for parents by the Association for Retarded Citizens. LEAs provide their own school health services.

Psychological Services

Several of the LEAs employ one or two psychologists to serve their schools. Some LEAs, however, cannot afford one psychologist, and arrange for psychological services through contracts with agencies subsumed under the Department of Human Resources (DHR), such as the Developmental Evaluation Center (DEC) or community mental health clinics (CMH). Regardless of whether an LEA employs its own psychologist or contracts for one, some inevitably have more needs than available psychological services. The REC helped LEAs determine fair rates for contracted services in the past, but nearly all LEAs handle this on their own now.

Psychological services can cost three times as much in one county as they do in another because of longer distances between schools, the particular configuration of student needs in each school and across schools, and the time-management skills of the psychologist.

Whether employed by the LEA or not, the psychologist is, in the eyes of most staff, a pivotal component of exceptional chidlren programs. His or her expertise is crucial to the appropriate identification and processing of students. The diagnosis of a child as emotionally handicapped almost always rests ultimately on the psycholgist's judgment of the available data. Some teachers look to the psychologist for more than IQs and an understandable, applicable diagnostic writeup. They look for advice and encouragement. Just as the cost of his or her services goes beyond their face value, so too does the value of these services.

Physical and Occupational Therapists

Seaside administrators and teachers alike report that the lack of physical and occupational therapists in the area is a critical stumbling block to providing handicapped students an appropriate array of services. It has been and continues to be very difficult to recruit therapists and even harder to retain them.

A few years ago, one county DEC had two physical therapists and one occupational therapist on staff. The county LEA contracted for OT/PT services with the DEC and for some time at least a satisfactory level of services was available. But all three therapists have since left the area. And although the DEC has been able to hire one full-time replacement, it cannot afford to share the person's time. Consequently her students with physical handicaps are not receiving a crucial related service.

Another district in the area is a bit more fortunate in this respect--but hardly so. The LEA can afford one therapist, so it tries to give some therapy to every child who needs it. This results in a little for all but rarely enough for any. One TMH teacher said that, compared to some of the other districts, she considers herself to be one of the more fortunate ones because her students at least get something.

In the county LEA in which the largest Seaside city is located (population 30,000), the general hospital employs one PT and one OT. The LEA contracts with the hospital for itinerant OT/PT services. Because the county is large and because needs are great, the itinerants are spread thinly and must likewise spread their services thinly across the students who require them.

Speech Therapy

Like physical and occupational therapy, the demand for speech therapy in the schools is high. Some LEAs must launch collaborative efforts for speech services as well. Unlike services in physical and occupational therapy, however, speech therapists work across LEAs.

One such inter-LEA arrangement involves two districts with very different needs. The prevalence of speech impaired students in one is nearly three times that of the other. They share two therapists, breaking down the cost according to the proportion of speech-impaired students in each LEA. Thus, one pays approximately 75 percent of the total salary costs while the other pays about 25 percent.

Arrangements like these further compound the typical itineracy role of a speech therapist, however. In-county travel time is a fact of professional life. The high prevalence of students needing speech services forces the therapist to work with students in each building providing frequent sessions of short duration. Cross-county travel time eats up much more in the way of human resources, resulting in even more rationing of services and, ultimately, less service per minute and per dollar.

Because not all potentially eligible students can be served or served adequately, districts must make hard choices that often result in moderately and severely handicapped students for down on the priority list. One district copes by using a secondary English teacher to provide elementary TMH students with some approximation of speech services. In this instance, despite gallant efforts by the LEAs to give their students something, service rationing is extended beyond almost anyone's idea of normal limits.

Administrative Consultation

The last of the specific related services to be discussed is administrative consultation. One can see that this is not included in the state's list of related services presented at the beginning of the section. Rather, it is what one might call an indirect related service that the REC provides to LEAs.

Officially, the REC is structured to render the services discussed in the section, "The Seaside Regional Education Center." Its special education services to LEAs essentially are limited to providing technical assistance. Prior to 1981, REC technical assistance consisted of staff and program development. At full staff, they encouraged and assisted teachers one on one. Hawking for resources, materials, and ideas, they "modeled" these skills and their enthusiasm and commitment.[1] But when the budget was cut, the REC lost the staff development specialist and the instructional resource specialist. The teachers miss them and still speak highly of them.

The loss of these positions resulted in a shift in emphasis from staff and program development to primarily administrative consultation and monitoring.

The budget cuts on one hand and the monitoring thrust on the other have forced the REC's exceptional children coordinator to ration what's left of her services in the same way that LEAs must ration theirs. The irony of the increased emphasis on administrative technical assistance is that it is necessary because the LEAs need it to ration their services more efficiently.

Related Service Agencies

The hierarchy of state government's executive branch at the department level includes two of many agencies. We have already reviewed the Department of Public Instruction. Parallel in level is the major social services agency, the Department of Human Resources (DHR).

---

[1] The former instructional resource specialist is an especially talented woman who taught TMH teachers how to write IEPs. For each teacher, the resource specialist would write a complete IEP for the most seriously impaired student, then she'd walk the teacher through the development of an IEP for a student with medium-range needs, and finally, she would set a 45 minute time limit for the teacher to write an IEP for a third student on her own.

DHR subsumes a number of branches. Of pertinence to handicapped children and youth are the Division of Health Services, the Division of Mental Health, the Developmental Evaluation Centers, and the Developmental Day Centers.

Division of Health Services

Among the many functions of the Division of Health Services are medical examinations and treatment for children and youth with physical and multiple disabilities. Although P.L. 94-142 funds will pay for at least part of most diagnostic services, treatment services are covered by insurance and other funding schemes.

What appears to make or break the effectiveness of this related service agency from the school's perspective are the staff physicians. According to one TMH teacher, the Seaside area clinic had a "very knowledgeable" physician on board until about a year ago when he left the area. Now, staff physicians rotate cases, and her TMH students who attend the clinic rarely see the same physician.

Division of Mental Health

This division provides services in the form of two agencies: Community Mental Health and the Child Development Center. The community mental health centers (CMH) offer a wide range of services including vision and hearing screening, psychiatric and counseling services, as well as psychological evaluations. Although, as mentioned, many LEAs must contract with the agency for services, those services are met with not so favorable reviews by school personnel. Some of the Seaside area clinics are open as few as two days a week, extending waiting lists (a span of eight weeks is not uncommon) and, as a result, time in limbo from evaluation to placement is extended. Further, communication channels between agency and school are not always fully open.

Evaluations cost parents $300 on a sliding scale if the parent makes the referral. If the school refers a child, it is charged a flat fee of $100. LEAs most strapped for related service dollars have circumvented CMH's payment policy. The teacher will call CMH, asking it to contact the parents of a referred child. CMH calls the parents and asks them to refer the child for an evaluation. Thus, the parent technically makes the referral, saving the LEA $100.

Another of the division's services is the Child Development Clinic. The clinic primarily provides preschool services for lower functioning students. TMH students, for example, who are identified prior to school entry attend the clinic's preschool until the age of five or six.

Developmental Evaluation Centers

The DECs actually provide diagnostic services that act in tandem with the preschool services provided by the Child Development Center. In addition, the DEC is responsible for providing multi-disciplinary diagnostic evaluations, intervention plans, consultation, follow-up services, and training in the area of developmental disabilities.

Developmental Day Centers

Developmental day centers serve as community placement facilities. Independently operated, they provide placements for up to 180 school days. LEAs and the centers work out joint agreements relative to funding the costs of the programs for handicapped students.

SOME ISSUES OF PARTICULAR CONCERN TO THE REC

The reader most likely will have surmised from the preceding pages that the REC is not completely devoid of problems. No doubt the major ones are already apparent. Nevertheless, for ease of reference and for the sake of clarity, they will be briefly described again in this section. Their order of presentation does not necessarily reflect the importance placed upon them by the people of the Seaside area. Indeed, it is doubtful if a single priority listing could be devised on which even a majority of stake holders would agree. Our order of presentation, rather, reflects the research team's subjective ordering. Thus, some issues are likely to be found anywhere in substantially the same form as in the Seaside context, but as we move down the list, the influence of Seaside's context is likely to become more and more apparent.

P.L. 94-142

By the time P.L. 94-142 reached the Seaside area in 1975, even the most seasoned local school districts had been providing special education programs for just over five years. These programs were discretionary and served only the most prevalent exceptionalities (TMH, EMH, LD). State funds were available only on a limited basis, but that was reasonable for the times since the extent of services needed to be only what the districts could bear. There was no mandate.

But things changed in 1975. First P.L. 94-142, then Powell, required that all exceptionalities be served, and served in a fashion that required a state of the art capacity for which the area schools were not ready. After all, with the help of the REC and area colleges, they had just begun to certify their EMH teachers in 1974. Things seemed bleak indeed, particularly when one considers that the money they needed to alter their operations enough to meet the mandates never materialized.

They did a lot of catching up those first years. Children they had only wondered about before were now showing up at school. And, although it has been hectic since 1975, the Seaside districts and the REC are quite proud and somewhat amazed at how far they have come. But they are the first ones to admit that "program quality" remains as a goal; getting programs in place has been their main concern to this point.

The mandate simply did not fit their capacity to respond. And they think it is unfair that they have had to live up to the same expectations that were set for other, more prepared districts. How have they survived? They have had to translate the rules into what the system could bear. And whereas they feel that their response has been tremendous, given where they were when the law came down, their main concern is "staying legal" in the eyes of those who judge them. The general feeling is that any reasonable person who knows how far they have come with what they have had to work would agree that they are "doing right" by the area children. The problem as they see it is that those who have judged them have not always been reasonable about it. Of course, some area districts have fared better than others in the eyes of the monitors. But not everyone started at the same place--some districts had more to start with and less to overcome, others had less to start with and more to overcome. The requirements are blind to these considerations, however.

Of course, the Seaside LEAs did not stand alone in their attempt to live up to the law--the REC has been with them from the start. And, until this year, the REC's main priority has been to improve local capacity to respond to the mandate. Their job has been "LEA development." Their approach has been to increase local expertise. REC technical assistance has come in the form of staff and program development--to help the locals become more like what the law requires them to be. And, like the relationship that always develops between a good teacher and the student, the REC understands "where these folks have come from." The good teacher always takes this into consideration when pacing instruction and evaluating performance; the student of a good teacher knows this and appreciates it.

But now the REC's mission has changed; it is both helper and monitor. The trade-offs associated with this change are themselves an important issue, and one to which we will devote more time later in this section. At this point, however, it is more important to understand the perception of this role change.

From their perspectives, the DPI and advocates fear that the REC, in its role as teacher, will not require as much from the LEAs as outside monitors would require. They wonder whether LEA efforts to live up to the mandate will level off now that their teacher is also their monitor.

The view at the local level is quite different, however. Something has happened; special education has changed and so have the districts. The gains that have been made cannot be allowed to backslide; there is a good deal of pride over what has been accomplished. There is no doubt but that there is a great deal left to be done, but the most significant change has been in the degree to which the locals have assumed ownership of their programs and responsibility for their exceptional students.

The REC credits this assumption of responsibility to two factors. First, the "big gun": P.L. 94-142. Even though REC staff will argue that the regulations are too cumbersome and that they are blind to local capacity and conditions, they are quick to add that the growth that has taken place would not have happened without something like P.L. 94-142. This is not to say that they would not alter P.L. 94-142, if they could, better to fit the reality of their situation; they have definite ideas about how it could be altered to fit the Seaside situation more closely. Nor are they saying that given the time and necessary resources, the local districts wouldn't have come to the same place on their own. Rather, they are saying that, given the extraordinary demands of the region, advancing special education so far so quickly would have been impossible without the mandate and the resouces that have accompanied it, despite their limitations.

The second factor affecting local ownership is the position of the local director of special education. The REC credits the role of the local director as well as the individuals who play the part in the Seaside LEAs. The local directors are the districts' own people; they know the district, they know special education, they know the law. Local directors have become an "in-house" source of technical assistance for teachers and administrators. Perhaps their most significant accomplishment has been educating principals and superintendents with respect to the requirements of the law and the goals of special education. And this, say the REC staff, is the first step. Programs are in place and better accepted because local directors serve a technical assistance and a public relations function within the district.

Moreover, the local directors assume responsibility for special education within the district. And someone from within must take responsibility. The local directors also take great pride in their programs. "I want to get it right," is the way one expressed it to us. And, with "responsibility and pride" as the driving force, "regulations and compliance" become less consequential.

Local Conditions and Fittingness

It is rare that a policy or program which has been designed for general application suits every situation in which it is used. The match between what is required and the local capacity to respond becomes the critical factor in determining how the policy or program is carried out at the local level.

In view of what we know about the Seaside area, it should not be surprising that local capacity was and continues to be hard-pressed to live up to the requirements of P.L. 94-142. The mismatch between the requirements of the law and the capacity of the Seaside area to meet those requirements should be obvious to the reader by now. Four aspects of the local condition have been particularly troublesome in attempting to tailor a good fit: status of public education, status of special education, poverty and disadvantage, and student population. The status of special education was touched upon in the first part of this section and will be treated again under a subsequent issue. The following sections address each of the remaining three aspects of the local condition.

Quality of Public Education

Through a unique set of historical and political circumstances, the public schools of the Seaside region have been slow to develop. They were neglected first by the landed gentry who were not motivated to support public education while, in other regions of the county, support from state and local governments had become substantial. In more recent times, conflicts over school desegration caused a similar, although less devastating, withdrawal of support from public education. Moreover, it has been only within the past 10 years that local fiscal support for public schools has improved.

Poverty

Perhaps the most formidable local condition with which the Seaside schools have had to contend is the extent of poverty in the region. Here, too, history and politics have dealt a serious blow. The proportion of the population who live in substandard conditions has increased the burden on the public schools by increasing the number of children who require special attention because of disadvantaged home environments. Beyond this, the sheer number of children likely to require such attention continues to mount because the birth rates in poorer counties far surpass those of wealthier counties. Thus, the districts less able to afford interventions with these children are the ones most often compelled to provide them. Moreover, poor parents in these counties are less likely to support the public schools and to promote the value of education with their children. These same parents are more likely to set lower expectations for their children and less likely to complain about or recognize inadequacies in their youngsters' education. And so the cycle continues. Many Seaside districts sit at the center of this circle and can do little more than hold their ground in the midst of a disheartening social situation that is beyond their control. The fact that, on the average, 20 percent of the area's population line below the poverty level and that the proportion of the population completing high school is among the lowest in the nation give an indication of the extent of the problem.

Student Populations

In addition to a substantial proportion of disadvantaged children and more than their share of exceptional children, the Seaside area has other populations of children who require special attention or cause further hardships for the public schools. Migratory children live in or pass through the region and require special programs and teachers. About one-quarter of these children need special education services in addition to the services provided by the migrant education program. The children of transient families enter and leave certain districts on a regular basis, although much less predictably than migratory children. Some of these children have handicaps as well. However, the real problem caused by children of transient families is the effect they have on enrollment which, in turn, affects local school budgets.

Declining school enrollments have caused problems of their own in the Seaside area. Although enrollments have stabilized of late, the impact of an eight-year decline has been substantial for most Seaside districts. For each of these years, districts have started the school year with fewer resources than necessary to meet the needs of their students. Moreover, the disruption caused by budget adjustments that come well after the school year is under way discourages local districts from seeking all the relief to which they might be entitled.

One can expect local implementors to comply with a mandate in the same measure that their capacity enables them to do so. The existence of the four factors just discussed constrains that local capacity greatly. The situation is made even more difficult by a funding system that does not generate the resources necessary for the area's schools to overcome their demographic and geographic circumstances.

Funding

There is little doubt that the Seaside area schools could better respond to P.L. 94-142 if they had the necessary resources. In fact, it is remarkable that they have progressed as far as they have given their conditions and the inadequacy of the current funding system.

There are several major problems with the state's school finance mechanism that adversely affect the Seaside districts and the implementation of P.L. 94-142. One basic inadequacy is the unit of measure: average daily membership or ADM. All subsequent calculations in determining the state's contribution to local public education are based on ADM. The inadequacy of ADM for funding rural schools is that the student-teacher ratios set by the DPI do not always apply to small schools which do not fill classes to capacity according to the schedule. Remember, "Kids don't come in packages of 26." Rural schools often need an additional 0.3 FTE teacher or 0.2 FTE secretary and have no choice but to tap local revenues, which often are not available, to make up these differences. The problem with the ADM approach to school finance is that it does not consider such factors and thus discriminates against rural schools.

Of equal or more importance than ADM is the lack of a required local effort in the funding formula. Not only are Seaside schools subject to federal and state economies (e.g., 20 percent cut in Title I funds, reduction in REC staff, elimination of the RTCs), but they are subject to fluctuations in local economies. Fewer local tax dollars means less revenue for social services and education. Better trained and more experienced teachers are difficult to attract to the area, or to particular counties in the area, because fewer local dollars are available to supplement the state salary schedule. Various state finance studies have recommended that required local effort should be built into the funding formula in order to provide equal opportunity for children in the state.

Added to Seaside funding problems in general education are those associated with special education. No recognition is made of the fact that children with different types of exceptionalities require different levels of resources to be served adequately. As we noted earlier, the state sets the teacher-student ratio limits which dictate the number of students assigned to a teacher and, in some cases, an aide or two aides. The variable ratios alone make costs widely variable, but beyond that, children with different handicaps require different amounts and types of related services. These considerations are not reflected in the funding formula. Moreover, the fact that rural districts have additional problems related to relative sparcity goes unrecognized as well, a fact which compounds the funding inadequacies. Although the Seaside region is not nearly as sparcely populated as some rural areas, it is sparce enough to require that TMH and some low-incidence students be transported to central locations within counties. Centralization is necessary because it takes a large number of TMH students to generate enough special education add-on dollars to support the program, given a funding formula which does not recognize that TMH is a low-incidence handicap or that the TMH teacher-student ratio is set lower than that for more mildly handicapped students.

The current special education funding formula presents another problem for the Seaside area. The "caps," or limits, put on the number of children to be served in each category of exceptionality are inconsistent with the actual state of affairs in the region; EMH, LD and gifted children appear in greater numbers than the reimbursement schedule will allow while the EH category never reaches the cap set for it. This, of course, means that some Seaside LEAs serve EMH, gifted and LD students for whom they are not reimbursed and, at the same time, revert money in the EH category which could be put to good use serving the excess EMH, LD and gifted children. While the new funding system should solve this problem by eliminating the categorical caps in favor of an aggregate cap, we have seen that the new formula will affect districts differently. Depending on the configuration of student populations, it is anticipated that 12 of the 17 Seaside districts will actually lose money under the new system.

The problem then for the Seaside area is a funding formula that is too simplistic to account for the real needs of different types of children and districts. Proposals made to the legislature which have identified the problems with the current special education funding system and suggested solutions (basically a weighted system that accounts for degree of severity of disability) have been rejected because they were too complex. It appears that the legislature is not ready to move beyond a "dollar for dollar equity" approach to funding.

Because the funding system is inadequate to meet the needs of the region, local districts, aided by the REC, spend considerable time and effort finding or devising ways to stretch their available dollars.

Dollar Stretching

Very few people would argue with the intent of P.L. 94-142. If all things were equal and possible, we would all want our own children to receive the same kind of attention in school. But, as we know, all things are not equal; nor are all things possible. The people of the REC and the Seaside area know this all too well.

The requirements of P.L. 94-142 represent a "state of the art" system of education. They assume that each implementor takes on the task of implementation armed with equal resources and performs it within the same set of conditions. When this assumption is not true, those with less capacity--fewer resources or less favorable conditions--find it necessary to ration their services. When one has fewer resources and less favorable conditions, rationing starts sooner and becomes more pronounced. Such is the case in the Seaside region; in fact, the Seaside area may be one of the hardest hit areas of the country in this respect. Moreover, because resources and conditions vary within the area, the amount of rationing that takes place within it also varies.

Rationing services in the context of implementing a mandate naturally can cause problems, particularly when the monitor is unfamiliar with the implementor's conditions and resources. If the monitor doesn't realize that rationing is a predictable behavior when conditions and resources do not match the requirements of a mandate, problems are compounded. And when the monitor has the power to bring unfavorable consequences to bear upon the implementor, the implementor's attention shifts to "staying legal." Thus compliance with the requirements, regardless of how unreasonable they are for a given context, takes precedence. And the cruel irony is that as more energy and resources are shifted to compliance ("staying legal") they are drawn away from services, which further minimizes progress toward the real purpose of the mandate.

If we can accept the fact that the conditions in the Seaside area are challenging at best, let us look at the resource side of the equation and review several illustrations of how services are rationed. All districts are susceptible to economic conditions at the federal and state levels. Reductions at these levels usually find their way to the local level. In unusual circumstances, they are also susceptible to local economies. For example, a plant closing in one community may cause a school to be closed, or in another town a defeated bond election may preclude the addition of a new school facility or the purchase of new equipment. The state of the local economy, in effect, may prevent the expansion, improvement or maintenance of some aspects of the school operation. In this state, however, the fact that there is no required base of local tax support makes local public schools more dependent on the local economy than districts in other states. Moreover, we have seen that local support for public education also has varied for political reasons such as school desegregation. And while local support has improved over the past 10 years, it has not done so across all counties in equal measure.

No doubt the reader by now will have recognized many instances of local dollar stretching and service rationing. But there is, in addition, a "rationing chain reaction" effect when budgets are affected above the local level. The General Assembly, faced with what it perceived to be poor economic conditions in the state, reduced the DPI budget in the spring of 1981. The legislature acted predictably; they projected a deficit situation and, because of a constitutionally required balanced budget, had to be able to save dollars somewhere. Upon receiving notice of its budget reduction, the DPI in turn had to look for ways to absorb the cuts. The Division for Exceptional Children was handed its share of the budget reduction and began to search for ways to reduce its services in ways that it felt would create the least harm. Based on its priorities and the demands placed upon it, the division made three cuts: eliminate the RTC's, a reasonable administrative decision since it most likely felt that training for regular educators was less important at this point than some other alternative, like, for example, the training of special educators; the reduction of REC special education staff, no doubt a hard choice; and assignment of the monitoring role to the RECs, no doubt a decision made only after considerable deliberation.

These decisions had a predictable impact on REC special education staff. With fewer staff and more responsibility, the REC had to make rationing decisions of its own: less technical assistance to teachers, fewer meetings with local directors of special education, less LEA development.

The REC's decisions then had predictable effects on local districts. With less help from the REC, the LEAs were less able to meet the demands placed upon them by their special education programs. Less staff development meant children were served by teachers less capable of meeting their needs; fewer meetings with local directors meant less coordination within the region. The list goes on; but the point is that budget reductions and, as we have seen, tampering with the funding distribution system means that fewer resources will find their way to children, who rest at the very bottom of the chain.

Moreover, rationing occurs within the LEAs themselves, independent of budget cuts. Here the rationing takes place because of insufficient funding to start with. Consider the severely retarded child who is placed in a TMH room because monies are simply not available to provide a program for one child. Consider, too, the adolescent TMH students who are housed in an elementary school because no adequate facility exists at the junior high or because the junior high is too far away. The very premise for noncategorical resource rooms is that they are less expensive than providing separate LD, EMH and EH programs at each school. Of course, the noncategorical rooms are justifiable from a "time in transit" perspective as well, but if all three categorical programs were available at each building, transportation time would not be a problem.

Rationing at the local level is not limited to instructional services. Related services also are rationed, but we will address the related services issues separately in a later section.

To this point we have treated resources as if they were limited to fiscal or material resources. But, of course, we know that human resources, the professional expertise to deliver services, must also be considered. In most respects, human resources are more essential than fiscal ones. Naturally, one couldn't purchase human expertise without money, but at the very root of the service delivery mechanism is the service deliverer; and the quality of the services which are delivered depends on this person. We will discuss this issue at length in a subsequent section, but we would like to provide a few illustrations of the effects of limited human expertise on the rationing of services.

Recall the former regular teacher who told us how mildly handicapped students were handled in regular classrooms prior to the 1970s--"I'll get to him tomorrow." This illustrates what happens when service providers do not have the know-how to serve their clients; they do very little for them; one can do only what one can do. Also consider the regular teachers in one school who forced the principal to convert the EMH resource room into a self-contained EMH classroom by arguing that they couldn't attend to their nonhandicapped students adequately. This latter example illustrates another important point that is particularly relevant to the Seaside context: expertise, no matter how refined, can go only so far. Those teachers may have been completely competent to maintain one or even two EMH students in their classrooms if their other students were "typical." But in many of the Seaside schools the student makeup is far from typical. We have seen rooms in which 31 of 34 students are also served in Title I, special education, and/or migrant education programs. Excessive demands in the classroom may cause the teacher to start rationing his or her services much sooner than his or her level of expertise would dictate, just as Seaside conditions tend to cause rationing to start sooner and to be more pronounced.

IEP Process

The IEP process consumes a considerable amount of time in the Seaside area. It has been the primary topic in staff development activities since 1975. Moreover, the time devoted to it on a day-to-day basis in the schools is substantial. Consistent with the national scene, the IEP and its development has of late become "normalized." This does not, however, lessen the concern over the value of the process when compared to the energy it consumes.

Parent input in many districts remains a major concern, particularly in the poorer counties. Locating parents and obtaining their consent continues to eat up staff time. Unlike the national situation, the generalization that parents of moderately and severely handicapped students take more interest in the IEP process is not necessarily true in all Seaside districts. What does hold true, however, is that parents of lower socioeconomic status tend to be less involved. And, in the poorer counties of the Seaside region, this includes parents whose children are more severely handicapped. Estimates across various LEAs of the number of parents who actually attend various IEP meetings ranges from 10 to 50 percent, with participation dropping off even further for parents of secondary students.

Reasons for lack of parental involvement range from lack of transportation to outright fear of the establishment. What is perhaps most disheartening is that many parents are unaware of their rights. This is not surprising, however, when one considers that some are unable to read or write and that others have disabilities as pronounced as their handicapped children. It is not difficult to understand why many parents would rather leave decisions about their child's education to school personnel. One might say that greater measures should be taken to inform parents of their rights and the needs of their children, but when faced with a relatively large proportion of parents who are poor, disadvantaged, and/or illiterate, one has few options to do so. The Title I program has made some progress in this regard, but the chances of making any real impact appear to be minimal.

The identification process for certain categories of exceptionality presents unique problems in the Seaside area. The identification of LD students is an uncertain game at best, given current definitional problems and lack of appropriate measures. Of greater concern in the Seaside area and the rest of the state, however, is the identification of EMH students. Here again, the lack of appropriate measures of aptitude and adaptive behavior presents problems which are only highlighted by the region's racial and socioeconomic characteristics. Thus, the identification process in the Seaside region suffers from common measurement problems as well as some that are unique to the area.

In considering the IEP process, one must eventually assess its usefulness to teachers in planning for and meeting students' needs. In this regard, the Seaside area is not much different from what is generally known about the rest of the nation. The IEP seems to have become a special education tool rather than a more generalized tool for programming. The IEP is often construed as a lesson plan rather than a more comprehensive planning device. Many regular teachers have little input in its development except to suggest subject area content that they would like to have serve as the basis for resource room tutoring. Some resource teachers accept such suggestions and try to work tutoring into the child's program. More aware resource teachers, even though they will tutor a child if it means keeping the regular teacher happy and thus keeping the child in the regular classroom, are concerned that many regular teachers think the resource room is meant to be only a tutorial setting.

An advantage that a few Seaside schools have over the other schools in the area and the nation is the availability of an objectives-based curriculum, which enhances the regular and special teachers' ability to jointly plan for the instructional integration of mainstreamed students. Using the system, two teachers can quite easily identify appropriate instructional objectives that can serve as the basis for cooperation in carrying out the student's program.

The physical document, the IEP, is nearly always completed by the special education teacher. The idea of regular and special teachers working together to create a program for a child seems to have failed in most of the area schools, as it has in most schools nationwide.

All is not lost, however. The fact that more people are involved in the entire process is certainly an improvement over past practices. Here again, the system is in place; quality is the next goal.

Appropriate Programs in the Least Restrictive Environment

Very few programs for handicapped students existed in the Seaside area prior to 1970. EMH and LD students remained in regular classrooms until eventually they dropped or were "pushed" out of school. Some were served in Title I programs and got by quite nicely there. Children who would be considered EH by today's standards got by as best they could at home and at school. The ones that couldn't cope were sent to the state psychiatric hospital. TMH students either stayed at home or were sent to institutions. Even some EMH students ended up in these facilities.

Severely and multiply handicapped children rarely made it home from the hospital and some didn't make it at all. Those who survived were sent to institutions; physicians laid it on the line with parents. Children who had vision and hearing problems did what they could in school; many of their problems went undetected. Those who had severe sensory handicaps went to state operated facilities where they lived and grew up with "their own kind."

When categorical funds were made available by the state in 1970, special education programming had its real start. The programs that developed in the Seaside area between 1970 and the start of the P.L. 94-142 and state mandates served EMH, TMH and LD students. Although LD students had some regular classroom contact, EMH students attended self-contained programs in regular buildings. Programs for TMH students were one step removed--housed in facilities apart from regular public schools. Children who had more severe disabilities were not affected by these programs. Their status and fate remained the same.

After 1975, the right of all children who have disabilities, and those with special abilities in this state, to an appropriate education in the least restrictive environment was conferred. Where are these children today?

In the Seaside area, only a handful of severely/multiply handicapped youngsters are served in the public schools. Those that have can be found in self-contained TMH or multiply handicapped classrooms. The others are placed locally in community facilities or in state institutions outside the region.

Students with mild to moderate hearing or visual disabilities attend regular classes, although now some special education teachers have been trained in summer workshops to serve as resource persons to these children and their regular class teachers. There are very few itinerant teachers for hearing impaired students and no certified teachers for visually impaired youngsters. Districts who need them either can't find them or can't afford them. Those children with severe sensory handicaps have remained at the state residential facilities.

For students with severe and low incidence handicaps, the implementation of state and federal special education mandates in the Seaside area has meant different things. Some are better off than they were, and for some one can hardly tell the difference. Certainly, the type of handicap always has had a great deal to do with what happens to a youngster. But what one tends to forget is that the capacity of the context to support the individual can mitigate or compound the actual condition. In many of the Seaside communities, a lack of fiscal capacity has influenced local ability to support children who have needs beyond the system's capability to provide for them.

Nevertheless, what has happened to these children has been impressive and unprecedented in local history. Children have returned from institutions to live at home and attend school in the county. Physicians have more options; they can give parents more hope for their children's welfare.

Although a few districts have exemplary TMH programs, most TMH and multiply handicapped students are placed in self-contained classrooms in or on the grounds of public school buildings. They tend to be isolated physically and psychologically in most districts and buildings. Reasons for this physical isolation are most often related to inadequate facilities, which result in these programs being placed in buildings that are separate from the main building or in parts of the building not ordinarily occupied by students. In addition, because space is a problem in most LEAs, these students are sometimes housed in buildings that serve age groups other than their own. Moreover, physical isolation most often fosters psychological isolation, stigma and the perpetuation of stereotypes.

Children who were isolated in community programs or housed in one school building, primarily TMH and MH students, are now seen in most schools. And although the local fiscal and human capacity to provide the best programs for these students is limited, programs do exist. They are in place.

Limited resources hit particularly hard on these children. Because resources must be stretched to serve all children with exceptionalities, and because each child is entitled to at least something, these children more often get less than they need. Most TMH children are from very poor homes. The lack of an appropriate environment before and during their school career mitigates any progress that they can achieve. Teachers raise their students' abilities just to see those gains lost over the summer months and even over weekends and week nights.

Today in the Seaside districts nearly all LD students attend regular classes and spend part of their day in LD or noncategorical resource rooms. The others are in self-contained LD classrooms, but they are few in number. The situation is reversed for EMH students. Most of them are placed in self-contained special classes and some spend their school day in regular rooms and go to EMH or noncategorical resource rooms for part of the time.

Students who are labeled EH appear in far fewer numbers than EMH or LD students. Those who are identified as EH have the same options as EMH students: self-contained special classes or regular classes with resource room services. Because of their relatively low incidence in the Seaside area, few districts have programs for EH students. So, when an EH child is identified, some type of alternative arrangement has to be made. Most often the student is placed in a noncategorical resource room or, if no such room is available, an EMH or LD resource room will be made into one.

Identifying children as LD, EMH or EH is no simple matter in an area in which so many children have needs. The national confusion over definitions and the lack of appropriate measures is compounded in the Seaside area. There is very little certainty about whether any particular child is mildly handicapped and even less certainty about which of the three labels is most appropriate. Labels become meaningless.

Whether a student is labeled and served as EMH, LD or EH depends on a number of factors which are independent of the child's actual condition. We have seen young children suspected of being EMH who are called LD until there can be more certainty. We have seen a reluctance to identify any child as EH; labels like LD and even EMH are preferable. We have seen parents request that their children be called EMH rather than LD so that they can attend an EMH program staffed with a teacher the parents prefer. Again, labels become meaningless, and so does the match between label and program type.

Further, whether a mildly handicapped child receives special education services depends on the availability of special education, Title I, and migrant programs in a particular school. Given the resources available across these three areas and the limited overall resources of most districts, the best use is made of the total set of resources by overlapping the three areas. A mildly handicapped child who also qualifies for one or both of the other two programs is as likely to be served at least partially through them as through special education alone. Resources from the three programs are balanced so as to provide the most children with the most services.

Moreover, where a child is placed depends on a number of factors other than on what one might assume to be diagnostically appropriate considerations. There is a clear preference on the part of parents and administrators to place a child as close to home as possible, regardless of the type of program available. And while one might say that such placements, based on factors other than matching the child's label with the title of the program, are inappropriate, we also have seen that the type of program is much less important than the quality of the staff who run it or the climate of the building in which it is located.

Although many districts around the country have difficulty identifying and placing mildly handicapped students, the issue in the Seaside area is particularly pronounced. The needs of the general student population are so great that the distinction between mildly handicapped and nonhandicapped children becomes blurred. Distinguishing among mildly handicapped students for purposes of program placement becomes inconsequential because placement will ultimately depend on what is available locally. If the child's label doesn't fit the program title, the label is changed. If the label cannot be changed, the program becomes noncategorical.

Beyond these types of changes within special education, the availability of Title I and migrant programs makes distinctions among children and programs even more difficult. The overlap between special education and Title I services in various districts is so great and so fluid that telling the two apart often is impossible. If there is room in Title I and none in special education, a mildly handicapped child who needs help only in reading may never be labeled as handicapped because his needs can be met in the Title I resource room. In another district, there may be room in the LD resource room but none in the Title I program. A disadvantaged child may be labeled LD in order to provide her with the help she needs in reading.

This type of manipulation is necessary and, moreover, it is commendable. It is to the credit of the teachers, administrators, and coordinators who keep it all straight that the greatest number of children get the help they need.

What is "appropriate" and "least restrictive" in the Seaside area is defined locally by what is available. And although there are rarely enough resources available to make every placement appropriate and least restrictive, the locals have been able to manipulate what resources they do have to establish programs. And the decision as to which of these programs is most appropriate for any given child is determined under the principle of providing as much as possible as close to home as possible and independent of categorical labels.

LEA Programs for Mildly Handicapped Students

By far, the largest number of handicapped students fall in the three mildly handicapped groups: LD, EMH and EH. These students spend most of their school day in regular classrooms and go to resource rooms (categorical or noncategorical) for an hour or so each day; they are mainstreamed. Naturally, the resource room model of service delivery requires close coordination between regular and special teachers.

The primary vehicle for arranging this coordination is the IEP. We have seen, however, that in most cases the IEP has been less than effective in meeting this expectation. The responsibility for IEP development falls mainly on the special education teacher with minimal input from the regular teacher after the development stage. Moreover, in many schools the regular teachers do not understand the resource model and view it as a vehicle for tutoring. Sadly, many resource teachers accept the role of tutor, believing that at least they can help the student survive in the regular class and placate the regular teacher to the extent of allowing the student to remain. What is even more disheartening is that some resource teachers believe that their job _is_ to tutor students on regular classroom content. In either of these cases, however, the regular teacher operates the class as usual and does not accommodate the mildly handicapped student.

One should not assume that the description above characterizes all regular-special teacher interactions. In fact, in many schools this is not the case. And where mainstreaming does work as a coordinated program between regular and special education, there are predictable reasons for it. Before we discuss those reasons, however, let us look at some of the reasons it doesn't always work.

Many resource teachers are young, recent graduates of area teacher training programs. Regular teachers, who tend to have more experience, are reluctant to accept them as full-fledged resource persons. Their skepticism stems from the fact that certification as a resource teacher does not require regular classroom teaching experience. Regular teachers are slow to accept advice on how to handle children in a regular classroom from a person who is younger than they and, more importantly, has "never taught." One must remember that many regular teachers believe that teaching in a resource room is not at all like teaching in a regular classroom. In fact, some resent the idea that resource teachers have a limited number of students in the room at any given time. Both their acceptance of the resource teacher as a "teacher" and their resentment of them seems to center on the number of students they handle simultaneously. It is not hard to imagine resentment or a lack of esteem toward resource teachers on the part of regular teachers when one considers that most regular teachers believe the resource teacher's primary job is tutoring students.

A serious concern about the credibility of resource teachers is raised by some black regular teachers in the area. They feel that some of the white resource teachers do not understand or are afraid of the black students who are served in the resource room. Some black teachers report that they have come to this conclusion based on the feedback they receive from their students.

On the regular teacher side of regular-special education interactions, we find a corps of regular teachers who have had no formal preparation for mainstreaming. Their teacher training programs did not include coursework or experiences that would have prepared them for their role in special education. Some graduated prior to the inception of P.L. 94-142 and, thus, their training programs were not geared toward its requirements. What is more discouraging, however, is that more recent graduates report that their training did not include such topics or experiences either.

The Seaside schools have had between five and seven years of experience with mainstreaming. No one should be surprised to hear that teacher reaction to the arrangement is mixed. What is surprising, however, is that the mix does not place regular and special educators completely at odds. Rather, some of each are in favor of mainstreaming and some of each would stop it tomorrow if they could do so. And, in fact, some have stopped mainstreaming, as we noted earlier.

Regular teachers who oppose mainstreaming feel that they have not been adequately prepared for it, and that some children who are mainstreamed are not ready for it. They believe that there is an overemphasis on mainstreaming without consideration of the child's needs and capabilities, nor is there adequate consideration of the regular teacher's ability to maintain the child in the regular classroom with a class full of nonhandicapped students.

Special educators who come down against mainstreaming say that, for some children, mainstreaming is not the best placement option. They feel that they could do more for some children if they had them in the resource room for greater periods of time each day. Some even report that up to one-half of their students need a self-contained program. These same teachers point to a lack of money as the reason for not providing self-contained placements for these students. The districts simply cannot afford to operate classrooms for 12 children. Of course, one has to wonder if resource teachers would feel that less mainstreaming should be done if more regular teachers were prepared for their role in integrating these students into regular classrooms and if the coordination and communication with regular teachers were more meaningful.

There are, however, certain conditions or procedures that foster greater acceptance of mainstreaming. One is the "block" scheduling arrangement. Regular teachers appreciate this type of scheduling because it reduces clock-watching as well as the amount of material the handicapped student misses while out of the room. Perhaps the greatest advantage of block scheduling, however, is a reduction in stigma associated with leaving the room for special help. Another arrangement that facilitates mainstreaming is the availability of a curriculum guide which specifies objectives for regular classroom instruction. The availability of this device in a few districts facilitates regular-special education planning and coordination of programs for mildly handicapped students.

Finally, departmentalized or ability grouped reading instruction facilitates mainstreaming in some districts because mildly handicapped students receive the bulk of their reading instruction in regular classrooms along with their peers who have similar reading abilities.

One must realize, however, that the success or failure of mainstreaming depends on more than scheduling, curricular materials, or grouping, although these factors do help foster a successful experience and, thus, more positive attitudes toward it. What we have come to see as the most consistent predictor of successful mainstreaming practices is the interactions and relationships among three key actors at the building level: the regular teacher, the special teacher and the building administrator.

Building Climate

It should come as no surprise that the buildings in which mainstreaming is working are those buildings where communication and cooperation are part of the regular routine. The key actor in setting the tone for such an environment is the building administrator. An essential attribute is the administrator's support for the special education program and the special teacher. No small amount of credit for the education of principals, of course, must go to the local directors of special education. It is at the building level that we see their hard work pay dividends.

In these buildings, regular teachers have input into the IEP in more than a *pro forma* fashion. The IEP document becomes a tool for communication among all three actors. Regular teacher input into the process of mainstreaming extends beyond the IEP to include matters such as scheduling and grading practices. Although no set grading procedure is evident from building to building, in most of the buildings where mainstreaming works a grading policy for mildly handicapped students has been discussed, agreed upon, and established.

Not the least of the reasons for a successful mainstreaming operation is the quality and character of the special education teacher, who must be perceived as competent by the regular teachers. Moreover, the mildly handicapped students must enjoy the resource room program and want to go to it. And they must report these feelings to the regular teacher.

A special teacher who is perceived as competent most often displays a commitment to children and an appreciation for and an understanding of the role of the regular classroom teacher. The special teacher in these positive settings is usually considered to be a hard worker and willing to "go the extra mile" for students *and* regular teachers. Not the least effective attributes of the successful resource teacher are organization and human relations skills, which go a long way in impressing the regular teachers with the value of the special education programs and in winning them over to attempt to accommodate mildly handicapped students. Of course, once the regular teacher makes a "good faith" effort the resource person must be just that--a resource.

Besides being all these things to all these people, the resource teacher must be able to gauge the situation so as not to threaten the regular teacher. He or she must know when to give advice or offer assistance, as well as when to back off and admit mistakes.

The most impressive aspect of the power of building climate is that it appears to overcome all odds. One is just as likely to find successful mainstreaming programs in the poorest of districts as in the wealthiest. Building climate transcends materials, schedules, student population, and facility. In fact, the most positive building climate we encountered was in the poorest facility serving the most disadvantaged student population in the poorest county.

Preservice and Inservice Teacher Education

Although some schools of education have attempted to alter their teacher training curricula to include content relevant to the integration of mildly handicapped students into regular classrooms, most have not. Those which have made the attempt have not been very successful. The same rift that exists in the public schools between regular and special educators exists on college campuses.

Mainstreaming, least restrictive environment education, P.L. 94-142, Powell--whatever one calls it--requires that regular and special educators work together. It is immediately apparent in most of the schools of the Seaside area that teachers, regardless of type, do not work together. Teaching is a solitary act and those most estranged within the system are regular and special educators. No one has trained them to or even suggested to them that they work together. Regular and special educators have not been prepared for their new roles under P.L. 94-142.

Whereas this lack of preparation is general nationwide, the Seaside area is particularly affected by a lack of qualified personnel. Most of the Seaside teachers are graduates of one of five nearby and predominantly black teacher's colleges. In fact, most are recruited from a college which is located within the Seaside region. And as of this year, that college's NCATE accreditation was revoked.

This is not to say that all Seaside teachers are of inferior quality. Nor are we saying that all graduates of this particular school are poor teachers. Rather, we are saying that there is general agreement in the area that many teachers have been inadequately prepared and, moreover, very few have been prepared for the type of regular and special education roles that are required to carry out the coordinated programs called for by P.L. 94-142.

The relatively large number of inadequately prepared personnel is partially responsible for less than adequate programs for exceptional children. Inadequately prepared regular teachers are less able to carry out their roles in the mainstreaming process. Of greater concern, however, are inadequately prepared special educators who are incompetent to deliver on their end of the mainstreaming arrangement. This failure is, of course, devastating to the process since so much depends on the quality and character of the special education teacher. In addition, some inadequately prepared self-contained special teachers make less than the necessary advances with their students and fail to impress regular teachers and administrators, which, in the long run, creates a negative perception of special education as a "dumping ground."

Whether the special teacher works in a resource room or a self-contained class, the quality of that teacher helps set the perception of the special education program as a credible operation or as a less-than-adequate track that merely serves as a holding ground for some students.

Of course, the most logical solution to the problem of inadequately prepared staff is inservice education. And whereas this vehicle traditionally has been ineffective in making any real impact on the behaviors of practicing teachers, the situation in the Seaside area has been more promising. The credit for advances in this area goes, to a large degree, to the REC. The REC special education and staff development personnel have made an all-out effort to identify district needs and to orchestrate training programs to address them. Teachers have been and continue to be certified on the job. Others have attended workshops and received individual consultation to upgrade their skills in areas related to special education and/or other topics. The extent of the staff development offerings is facilitated by the availability of REC staff, who either conduct the training themselves or arrange to have outside speakers do it. The REC's role prior to this school year has been primarily LEA and staff development. However, as we know, the amount of effort toward these goals has had to be limited because of staff reductions and monitoring activities. Further, this year was the last in which the services of the REC's staff development coordinator will be available. In the future, much of the coordination of staff development efforts will fall upon the REC's special education unit, which will reduce further the amount of direct staff development time that can be provided. Moreover, the RTC, which directly addressed the needs of regular classroom teachers involved in mainstreaming, has been eliminated. Thus, at a critical point when some advances were being made toward staff development, the human and fiscal resources necessary to advance the undertaking have been lost.

Related Services

Rarely do handicappped children have a single disability. This is particularly true in the case of moderately and severely handicapped students, who most often require an array of related services. For a number of reasons, many of these services do not exist or do not exist in great enough numbers in the Seaside area. Certain related services are very hard to come by. Occupational and physical therapy services are extremely limited because therapists cannot be recruited or retained in the area. Speech therapists are difficult to recruit as well, although their numbers are significantly greater than OT's and PT's. Even so, speech/language therapy services in the poorer counties are insufficient to meet the demand. Psychological services, although adequate in the wealthier districts, are less than sufficient in the poorer counties which cannot afford to hire psychologists and must contract for evaluations and other psychological services.

Those counties that must rely on contracted services through various social services agencies are again at a disadvantage because of limited social service resources. Local revenues for social services are under the same control as education revenues. The local social services budget is set by the county commissioners based on property tax levies. Social services agencies which receive limited local support are forced to ration their services. We have seen that in some counties these agencies are open for business only two days each week. Thus, the districts which depend on these services have fallen under the rationing contingencies of another segment of state and local government. Social services contingencies thus become the same for the local public schools.

The reader will recall that the Seaside districts receive one lump sum of special education add-on dollars based upon an unweighted headcount of exceptional children. Those dollars are to be used to provide for any and all instructional and related services for all of a district's exceptional children. The district receives the same amount of money for each student, regardless of disability and, thus, regardless of the type and amount of related services required. Under this system, the dollars necessary to provide related services are simply not available. As we have seen, the resources to provide adequate instructional programs are limited. Related services become a luxury for many children.

Several coping strategies have emerged for providing related services when one simply does not have the money to purchase them. Some districts will share a service and, thus, cut their costs. Although services may be more affordable, this strategy actually increases the absolute cost of the service because the service provider spends more time in transit and less time in direct service. Often, the result is thinly spread services and a vacant position for the next school year.

A second approach might be called "give everyone a little." Here, everyone gets some, but no one gets enough. This approach is easier for the administrator who must make the decision but much harder on the service provider who knows the needs of the children are not being met.

The final strategy is easier on the service provider but perhaps the most difficult one for the administrator to make. This rationing strategy provides adequate related services for some children and very few, if any, for others. In effect, inadequate state and local funding forces LEAs to make difficult decisions about how best to use their available resources to provide related services.

Collaboration Among Individuals and Agencies

Special education requires collaboration on a number of levels to be successful. We have seen examples and counterexamples of collaboration among individuals and agencies. Most central to our story, of course, is the collaborative relationship between the REC and the Seaside LEAs, which have been discussed throughout the case. In this section we look at collaboration among other agencies and people and identify several factors which may be viewed as either facilitators or barriers to successful collaboration.

Building-Level Collaboration

Collaboration at the building level may be the most important consideration in providing special education, for it is here that "appropriate program" and "least restrictive environment" are forged. Appropriate programs in the least restrictive environment hinge on cooperation and communication among the principal, the regular teacher and the special teacher, particularly for mildly handicapped students, but also for moderately handicapped youngsters.

We have seen that where this climate of collaboration exists, mainstreaming works; where it doesn't exist, mainstreaming is rejected by regular and special teachers alike. In schools where mainstreaming doesn't take root, what grows instead is a dual-track program that most likely does more harm than good. Regular class instruction is something separate from resource room instruction. Regular teachers argue that they cannot meet the child's needs in the classroom; special teachers concur and wish they had more direct instructional time with the student. Most often the resource teacher, in the name of mainstreaming, becomes a high-priced tutor.

We have also seen that certain materials, procedures, and human resources facilitate the collaboration process. Block scheduling, banks of instructional objectives and ability grouping all increase the likelihood of successful mainstreaming. A supportive principal, regular teachers who understand their roles in special education, and competent, personable special educators are the human ingredients. To the degree that these resources are in place, the stage is set for collaborative efforts that form the foundation for appropriate programs delivered in the least restrictive environment.

Intra-LEA Collaboration

The combination of high density population and high incidence of exceptionality that characterizes the Seaside LEAs makes it possible for virtually every school building to operate its own programs for EMH, LD, and EH youngsters. Noncategorical resource rooms are virtually universal and in some cases even self-contained classes are found. Thus, the only programs run on a district-wide basis are those for TMH and multiply handicapped students. Here, collaboration simply means that one or two buildings receive students from the remaining buildings. The receiving buildings are selected on the basis of available space. Once the arrangements are made, little more in the way of communication or collaboration occurs.

On the other hand, collaboration at the district level between special education, on the one hand, and Title I and migrant education, on the other, is impressive. As we previously noted, these relationships are pervasive and fluid. They grew out of necessity and are based on the principle of meeting the needs of as many children as possible by overlapping services and resources. And whereas most Title I and migrant education teachers are not certified special educators, the three types of teachers work together closely to coordinate their efforts and interchange their expertise. Linked by common goals for children, these special teachers tend to work well together at the district and building level. Again, it is people who make the difference.

Inter-LEA Collaboration

There is less collaboration between and among Seaside districts than one might expect. Only five of the fifteen county districts collaborate to any extent. A number of factors exist which to one degree or another offer some assistance to understanding the situation.

Referring back to Figure 1, the map of the Seaside catchment area, one quickly sees that water barriers virtually eliminate cooperation among the western and eastern counties. There is no bridge. A second physical barrier, distance, precludes cooperative programs among many of the other districts. The disincentive here, as we know, is student time rather than the cost of transportation *per se*. Thus, the only collaborative arrangements, the autistic program and the Tri-County Career Center, have been formed among adjacent counties. Again referring to Figure 1, the five western counties, which are the narrow ones whose boundaries form the western shore of the waterway, are involved in one or both of these cooperative programs. Their size, shape and proximity make such arrangements more feasible.

But there is more to this story than physical characteristics. Here again, people make the difference. Three of the five superintendents have a very close working relationship with one another. They point to this closeness as the reason for their cooperative programs. Moreover, they credit the REC's technical assistance for helping to establish and maintain these relationships.

A second factor that contributes to the minimal amount of interdistrict collaboration is the area's high population density. In most cases, sufficient numbers of children are available within a county to sustain programs within district boundaries. We have seen that TMH programs draw students from the entire county, but in no county LEA are TMH children transported across district lines. Also, we have seen that accommodations are made for low-incidence populations, like severely/multiply handicapped youngsters, in TMH or multiply handicapped programs. Here again, inadequate fiscal capacity and travel time prevent districts either from starting a separate program for one child (or a very small number of children) or from sending the child to another district.

Another barrier acts to limit the amount of inter-LEA cooperation. Ordinarily, an important incentive to district cooperation is resource constraints. Ironically, limited resources in the Seaside region actually act to reduce cooperation in two ways. The first resource barrier might be called "the pull-out problem." Here, districts are reluctant to join in a cooperative venture for fear of one or more of the districts pulling out of the arrangement. Pull-outs occur when, for example, one district no longer needs the program because its students have moved or otherwise are no longer in need of the service. The consequences are additional program costs for the districts that stick it out, if any of them do. The most serious harm comes to the district that "sticks its neck out" to house the program. Start-up costs--facility, teacher, materials--are lost if the venture fails and paid back over a longer period of time if the program manages to stay afloat with fewer participating LEAs.

A second resource barrier emerges when one considers the disparity in wealth among districts. The five counties that collaborate are among the wealthier Seaside counties. There is no incentive for them to cooperate with the poorer counties, which have very little to offer since they have fewer resources and more needy student populations. Poor counties are blocked from collaborating among themselves by a combination of resource and physical barriers. Although these counties would most likely benefit fiscally from some types of cooperative programs, the distances across and among them are prohibitive in terms of time in transit. Sharing a speech therapist, for example, is counterproductive since road time eats up direct service time.

LEA-Other Agency Collaboration

The final and perhaps most complex level of collaboration is reflected in arrangements between the LEAs and non-school agencies. Such agencies include teacher training institutions and social service agencies such as community mental health (CMH) and the DECs. When an LEA with one set of operating procedures enters into an agreement with a social service agency that has different ways of operating, negotiating an agreement that is functional for each participating agency becomes difficult.

Collaboration among Seaside districts and community agencies is constrained because both must ration available and shrinking resources. Some schools are forced to contract for psychological services. A social service agency like CMH, also rationing resources, becomes the recipient of that contract. Yet, CMH's operating procedures include opening their office for only two days a week. The mismatch between the needs of the two participating agencies becomes a glaring one. The school needs the psychological evaluation quickly to provide appropriate services and to meet mandated timelines. CMH needs an inordinate amount of time to provide the evaluation because it operates only two days each week. Disparate needs and aims cause the collaborative effort to become less than functional.

Two separate arrangements between districts and area teacher training programs have been quite functional. One LEA arranged to have school psychology interns conduct psychological evaluations supervised by a certified psychologist who ran the intern program. The LEA wanted students evaluated; the intern program wanted to provide its students with field-based training experiences. Both agencies had their needs met; the arrangement is functional for both participants.

Four Seaside LEAs needed to provide services for autistic students. The LEAs could not provide the services, either individually or collectively. They arranged instead to enter into an agreement with a teacher training institution to serve the students through a federally-funded demonstration program on campus. The agreement called for the college to bear the cost of the teacher and an aide, while the four LEAs shared the cost of an additional aide. All parties benefited; the arrangement is functional and healthy.

Thus we see that several factors influence the degree of collaboration among individuals and agencies in the Seaside area. Prominent among these are the "people factor" and the notion of mutual benefits or common goals. When the conditions are right for collaboration to occur--physical parameters, demographic features, appropriate incentives--the people take over, for even when agencies collaborate, it's the people who make it work.

REC Concept

The Seaside REC, a decentralized state education agency, provides a regional link between local districts and the DPI and also serves a technical assistance function. The REC transmits and interprets DPI policy but has no formal authority over the area's LEAs. Districts are free to choose whether or not they avail themselves of the REC's services.

Perhaps the best testimonial to the impact of the REC on the region is that rarely do LEAs forego participation in REC services. The REC is viewed locally as an asset, a helper and friend, a voice with the DPI. Among the seven RECs, the Seaside REC is reputed to have the best relationships with its LEAs. This no doubt stems from the character of the people who are the REC and from their philosophy regarding their role: "a helping hand rather than a heavy hand."

DPI officials are happy with the REC concept. Remember, before the RECs, the DPI was seen, as it is in most states, as "this nebulous place." The DPI believes that LEAs see the local REC as their center. They feel some ownership for their REC and thus are closer to the DPI.

No doubt the reader has seen the many advantages of the REC concept for the people of the Seaside area. In the following paragraphs we would like to summarize the most important ones and to identify some of the issues which surround them.

The REC holds the pivotal position in the implementation of education policy in the state. It transmits and interprets policy to the local districts. But in addition, the REC provides the technical assistance necessary to turn policy into action. How useful can a policy be if the locals, after receiving it, are helpless to comply? In transmittal, interpretation, and assistance, the RECs are vital to the policy maker and essential to the policy implementor. Again, they are more than worth their cost.

But the most important role of the RECs is the part they play in policy formulation. On one level the directors of the RECs have direct access to the top policy makers at the DPI through the Superintendent's Executive Council. This council is an important vehicle for transmitting policy information from the region back to the DPI. Further, program area coordinators meet regularly with their respective division directors at the DPI. At these sessions the status of current policy implementation is discussed and evaluated. REC coordinators can suggest modifications to their division directors. Moreover, division directors can present projected policy to the coordinators for their reaction. Coordinators, knowing their regions intimately, are quick to point out what aspects of the proposed policy will and will not work. They know how their LEAs will react; they know local capacity. So, the two-way communication between the DPI and the regions has evolved into a mechanism for two-way policy formulation. And although the central DPI ultimately makes policy, it has come to rely heavily on its regional staff for guidance.

The most visible advantage of the Seaside REC is the impact it has had on the area LEAs. In just over 10 years, it has managed to assist local districts to develop their staff and their programs. This result is particularly evident in the area of special education.

As we discussed earlier in this section, the role of local director of programs for exceptional children has been a key factor in developing LEA capacity to serve handicapped children. Through the local directors, the REC has mounted a massive campaign to develop LEA staff and programs to better fit the requirements of the special education mandate. Progress has been substantial; programs are in place.

The effort necessary to advance LEA development was greater than the REC special education unit could carry out alone. Literally, every program area within the REC joined in to help. As LEA needs were identified, the various REC units collaborated with the special education area to provide the necessary training or to bring in others from the DPI or elsewhere who could provide it.

The REC also helped the LEAs to establish relationships with other agencies for related services. The Seaside LEAs, like most districts nationwide, had very little experience in working with non-school agencies. The REC made initial contacts and started the dialogue necessary to establish and sustain collaborative relationships. The fact that the REC staff were personally acquainted with social services personnel greatly facilitated these interactions.

The REC also made arrangements with area teacher training programs to provide course work locally to certify Seaside special education teachers. When no training institution could offer a certification program in the gifted and talented area, the REC developed the course content for them and had them deliver it to local teachers. The tenacity of the REC staff in finding ways to meet the needs of the LEAs has been impressive.

The collaborative spirit of the REC is no more evident than in the working relationship between Title I and special education. The constructive overlap between special education and Title I in the LEAs stems from the efforts of the REC coordinators in these two areas. When the legality of such an extensive amount of overlap was questioned, the Seaside REC coordinators urged their respective division directors to seek approval for their projected mutual activities. And, as we know, they got what they wanted. The "go ahead" was quickly translated into action in the LEAs.

Another important service provided by the REC might be called technical assistance on dollar stretching or rationing. Because many Seaside districts have fewer dollars than are necessary to serve all children adequately, they have come to rely heavily on the REC staff to show them ways to stretch their resources, ways such as noncategorical resource rooms, English teachers as quasi speech therapists, and overlapping special education and Title I. The REC realizes that since the LEAs cannot afford every service and every program that their students might require, the next best thing is to work within budget limits to provide as much as possible for as many youngsters as possible.

One would think that the obvious advantages of the REC concept would make its position within the state education system secure, valued by all. But this is not the case. The question of whether to abolish the concept comes up each year in the legislature. So far, the REC network has managed to survive but some believe that it will last only as long as the present state superintendent remains in office. Why anyone would oppose the concept is not clear, but what is clear is that it doesn't take much to convince a legislator to speak out against it. The danger, of course, is that what may be a justifiable complaint may result in an impassioned movement by an influential legislator who is capable of turning the heads of his or her fellow legislators. What has been built can be lost quite easily.

There are other threats besides possible dissolution of the REC network. Whereas the REC staff reductions are not a threat to the decentralized concept, they are a threat to the REC's role. Fewer special education staff has meant less special education technical assistance and, thus, less LEA development. Moreover, the added task of monitoring has reduced further the REC's ability to provide assistance. Help for teachers is compromised in order to help administrators, who quite understandably take advantage of having their monitor in their midst to make sure that they are "staying legal."

The REC's role as monitor was initially perceived as a threat by REC staff. They feared that their assistance would be rejected, that the LEAs would come to view them differently and that 10 years of gains would be lost. We know that these things have not happened and that in fact the new role that has been forged--helper and monitor--has been very positively accepted. Nevertheless, the new role has not been without its share of problems.

Helper and Monitor

The first round of monitoring conducted by central DPI staff was not a positive experience for the seven Seaside LEAs that were visted. The review was superficial; it concentrated on whether things were present or absent and only rarely went beyond these checklist considerations. The atmosphere was one of uneasiness at best and of fear at worst. The locals had never been descended upon like this before and, to add to their uneasiness, they knew that they were likely to be found out of compliance in some respects. In 1979, when the first monitoring took place, they simply were too new at special education to be able to comply completely. They knew how far they had come, however, and they felt that their reasons for noncompliance in some areas were justifiable, if the monitors would listen.

Not only did the monitors not listen, they rarely asked questions or spoke to anyone. They completed their checklists, summarized some of the noncompliance issues, and returned to the DPI to complete their reports. Copies were sent back to the Seaside LEAs, who, to say the least were stunned. The REC staff stood by helplessly during the visits as the LEAs' egos were deflated and their worst fears were realized. Their frustration quickly turned into anger.

After it was over, the LEAs found themselves asking, "What now?" Problems and deficiencies had been pointed out, but no guidance was offered. It was left to the REC to pick up the pieces, and it did.

REC special education staff helped the LEAs prepare and file their compliance plans. The REC's role from that point on was to help the LEAs respond to the problems and correct the deficiencies.

The next round of monitoring was quite different. The actual site visits were carried out in much the same way as before, but they were carried out by the REC special education unit. Things went much better this time around. The REC knew the people and programs intimately; knew the problems and knew that significant progress had been made. The locals were open to the monitors under the new arrangements; there was no need to conceal anything. The visits turned into problem identification and problem solving sessions. Suggestions were made for improvement on the spot. The LEAs did not lose face this time; their accomplishments were praised in addition to their problems being noted. And, of course, the best part was that the monitor remained in the area to help solve problems after the site visit was completed.

The site visit as carried out by REC is a vast improvement over the former version. But what is more significant about the REC monitoring procedure is what happens before and during LEA decisions about special education programming and exceptional students. REC monitoring between site visits--before and during the time decisions are made--has amounted to a system of "on-going monitoring."

As we have noted, before a decision regarding special education is made by the LEAs, alternatives are reviewed with the REC monitors. "Will this fly or not?" Rather than the decision being made and the child and district living with it for three years until the next site visit, courses of action are monitored prior to implementation. The districts are more certain of the appropriateness of their actions; children and parents are more certain to receive appropriate services.

In most cases, the REC is there during the decision process as well. The REC coordinator can be consulted during the LEAs' Administrative Placement Committee meetings. As decisions are being made, she can influence and react to them. Thus, monitoring often occurs prior to any formal action, at a time when no harm has been done, during the decision making process.

Thus, although the transfer of monitoring responsibility was a cause for concern for the REC, it has turned out to be a vast improvement over past practices. Literally everyone in the Seaside area agrees. Moreover, the most significant improvement is what the new system means for children and the appropriateness of their programs.

As we have noted, however, the new system is not without its problems. The most obvious ones have been discussed: less time for the REC to provide technical assistance to LEAs, less time for the REC to help LEAs carry out their compliance plans. But these problems do not stem from the REC's new monitoring role. Rather they are the result of a reduction in staff in combination with the new role. If staff had remained constant, or better yet, if staff had been increased when the monitoring role was shifted to the REC, these problems would have been avoided. In fact, if these measures would have been taken, the new system would be an ideal arrangement, at least from the perspective of the REC and its LEAs. But, as we know, the views of DPI and the advocates are somewhat at odds with the locals' views. And this difference in perception is the real issue here. It lies at the center of the controversy over whether or not the REC should function as a helper and a monitor.

Even before P.L. 94-142 and the REC's monitoring role, DPI division directors began to raise the issue of the allegiance of RECs to their local districts. The DPI's position has been that the source of all policy rests with it, that the RECs are the DPI, and that it is their responsibility to support the DPI's position with the locals. The concern was that RECs were aligning themselves too closely with their LEAs. But the state director of special education has come to believe that the value of REC monitoring outweighs any concerns he might have had about alignment of loyalities. He believes that the new system has worked well because the REC staff have been able to act successfully as simultaneous helpers and monitors and because REC staff work much better with local superintendents in moving them toward compliance than the central DPI was able to do. The P.L. 94-142 compliance requirement was the initial impetus, but the sense of pride that has developed in the LEAs--their desire to receive a good compliance review--is now the primary dynamic.

But, even though the DPI has come to see the value of REC monitoring, advocacy groups have not. Their position is that, because the RECs are aligned with their local districts, they will not demand as much from them as outside monitors would demand. And here is the issue. It is an issue that any advocate most likely would raise.

Are the advocates right? Will the REC expect less than absolute compliance from the LEAs? Of course it will. Because, like the good teacher, the REC knows its students: the LEAs. It knows human and fiscal resources that are available to combat them; it knows how far the LEAs have come and what is left to be done on the way to absolute compliance. The REC takes these things into consideration when it provides technical assistance and when it evaluates performance. Any good teacher would do nothing less than this.

But then won't the LEAs take advantage of the REC and lessen their efforts toward compliance? Of course they won't. Remember, with the help of the REC, these are the people who have turned public education around in the Seaside are in a little over 10 years. These are the same people who have advanced special education in unprecedented fashion since 1975. These are the people who have faced incredible odds to make these gains. These are the people who always have taken responsibility for the children of the Seaside area and who now have assumed the same responsibility for their exceptional children. They are proud of their special education programs and they want them to be as good as they can be. They realize that they have made significant gains in getting programs in place and that they have a big job ahead of them to improve quality. They know these things, and so does the REC. Moreover, the REC has been instrumental in the LEAs' sense of ownership for exceptional children programs and knows that this responsibility for and pride in their programs will be the driving force from here on in. "Regulations and compliance" become less consequential when "responsibility and pride" take their places.

Moreover, the old type of monitoring appears to have outlived its utility. It served its purpose well in the Seaside area; P.L. 94-142, the "big gun," helped get programs in place. But the kind of monitoring that was associated with it did only that: checked to see if things were in place. A new approach is needed here now, one that advances quality, one that can show the way and help the LEAs get there. But the way to full compliance with the intent of P.L. 94-142 is as different for each Seaside LEA as it is for the Seaside area compared to other parts of the country. The new approach must be one that can be individualized in each of the Seaside districts. Each one has its own history, conditions and current status. The REC must be able to consider these factors as it helps each district set its goals and as it helps each district strive to reach them.

"But why should we trust the REC with this responsibility?" one might ask. Because the REC has as much responsibility and pride for "LEA development" as the districts have for "special education development." And both the REC and the LEAs realize that the next goal is to make certain that every Seaside educator and parent takes "responsibility and pride" for "child development." When this happens, the intent of P.L. 94-142 will have been realized.

WHAT CAN BE LEARNED FROM THE CASE?

In the preceding pages we have attempted to give the reader a "feel" for what it is like to live in the Seaside area, to provide a vicarious experience as seen through the eyes of the local participants. If we have been successful in providing such a "thick description," the reader by now will feel quite familiar with the REC, its circumstances, and its problems.

It is time to ask the question, "So what?" What can one make of all this? Is there anything to be learned? There are of course many lessons--although the reader should be careful not to assume that these lessons are generalizable to other educational service agencies indiscriminately. Indeed, a further reason for providing a thick description is to make it possible to reach a judgment about the degree of similarity between the Seaside REC and any other site to which a reader might wish to transfer the findings. If there is a high degree of similarity, transfer might be appropriate--but even then caution will be the best weapon of the prudent.

Early in the narrative we highlighted the significant events in the development of the Seaside region--its people, its schools and its special education programs. This history led us eventually to see what the conditions were like when in 1975 all districts were expected to respond to P.L. 94-142.

While some counties had developed adequate programs, many districts at that time had just begun to make some headway against the extraordinary odds which had been passed down to them. Wealthier counties had more local resources and fewer problems to overcome. Poor counties had less of the former and more of the latter. But P.L. 94-142 came down in just the same form for all of the Seaside districts. Any reasonable person could have predicted the results.

The districts which had the capacity to respond began to do so, although not without their share of problems in implementing a law that required so many new things of them. The poorer counties were nearly crushed by the sheer weight of the law, which was laid on top of the demands created by their local conditions and history.

And so we learn

LESSON 1: LOCAL CONDITIONS AND STATUS PRIOR TO IMPLEMENTATION OF P.L. 94-142 WILL PREDICT THE RATE OF PROGRESS TOWARD FULL IMPLEMENTATION. TO EXPECT THE SAME DEGREE OF PROGRESS FROM ALL DISTRICTS IS UNREASONABLE. ONE MUST CONSIDER WHERE EACH DISTRICT STARTED FROM.

Even less than favorable conditions can be overcome to some degree if local capacity is increased. Along with the mandate to serve all exceptional children needs to come the resources necessary to do the job. And although extra dollars from the state and federal government did find their way into the Seaside area, their numbers have been fewer than necessary to adequately meet the mandate. Moreover, the formulas that bring general and special education dollars to the area fail to recognize the local situation. The formulas are blind to the extra costs associated with delivery of education in the Seaside area.

The special education funding formula is insensitive to the fact that exceptional children have different needs and thus require different types and amounts of services. Just as the general education funding formula treats all districts in the state as if they were the same, the special education funding formula treats all exceptional children as if they were the same.

And so we learn

LESSON 2: FUNDING FORMULAS FOR GENERAL AND SPECIAL EDUCATION WILL BE ADEQUATE FOR INDIVIDUAL DISTRICTS TO THE DEGREE THAT THEY RECOGNIZE THAT DISTRICTS AND CHILDREN HAVE INDIVIDUAL NEEDS AND CAPACITIES.

And when capacity to respond to the requirements of the mandate is less than what is required, service providers ration their services; they stretch dollars, cut corners. What else can they do?

What we have seen here is that, because of extraordinarily unfavorable conditions, rationing starts sooner and becomes more pervasive. Not only have the schools had to ration their services, but the social service agencies, which provide much of the related services in the area, had been rationing their services for quite some time as well.

And so we learn

LESSON 3: WHEN LOCAL RESOURCES AND CAPACITY ARE INADEQUATE TO MEET THE DEMANDS OF FULL SERVICE COMPLIANCE, THE AVAILABLE SERVICES WILL BE RATIONED. FOR SOME CHILDREN RATIONING WILL MEAN THAT THEY WILL RECEIVE FEWER SERVICES THAN THEY NEED.

When services are rationed a child's program placement is determined primarily by what is available. But other factors also play a part. Because of time lost in transporting students to distant programs that purportedly are the best placement for a child's disability, parents and administrators have opted to keep children as close to home as possible and to alter local programs to fit the situation. This may involve changing a categorical resource room to a noncategorical one. Or, it may involve changing the child's diagnostic label to fit what is available.

Further manipulations are made that allow handicapped students to receive some or all of their remedial work in Title I programs. Here again, placements depend on what is available locally. Some handicapped children may never be called handicapped. Other children who are not handicapped may receive services as if they were.

And so we learn

LESSON 4: LABELS BECOME MEANINGLESS WHEN LOCAL CONDITIONS AND CAPACITY REQUIRE THAT SOME CHILDREN BE SERVED AS BEST THEY CAN THROUGH WHATEVER SERVICES ARE AVAILABLE LOCALLY.

We have seen also that the type of program in which a child is served is much less important than the people who serve the child. Building climate outweighs all other considerations, particularly for mildly handicapped children who are served in both regular and special classrooms.

Moreover, building climate can overcome virtually all of the unfavorable conditions that one would associate with less than adequate programs. The wealth of the district, the wealth of the people, disadvantaged student populations, even the repair of the building, all succumb to the power of a positive building climate.

And so we learn

LESSON 5: WE WOULD BE WISE TO INVEST OUR RESOURCES IN IMPROVING THE CAPACITY OF PUBLIC SCHOOL PERSONNEL TO WORK CO-OPERATIVELY WITH ONE ANOTHER. WHERE THEY CAN WORK AS A TEAM ON BEHALF OF CHILDREN THOSE CHILDREN WILL RECEIVE THE MOST APPROPRIATE PROGRAMS', REGARDLESS OF OTHER CONDITIONS.

The REC recognized the importance of quality personnel from the start. It says "staff" and "LEA" development in one breath. Their goal in the Seaside area has been to increase local capacity through technical assistance. But beyond the role the REC plays in helping to develop the districts, it plays perhaps an even more important role in policy formulation in the state. The DPI wisely listens to the RECs when it wants to institute change.

The Seaside REC represents the locals at the state capitol. It knows what the local system can bear; it knows what the local people will tolerate. The REC influences state policy-makers in designing policy with the local context in mind.

And so we learn

LESSON 6: A DECENTRALIZED STATE DEPARTMENT OF EDUCATION CAN SERVE VALUABLE FUNCTIONS IN DEVELOPING LOCAL CAPACITY TO RESPOND TO STATE POLICY AND IN DEVELOPING STATE POLICY TO RESPOND TO LOCAL CAPACITY.

In its new role as monitor of the special education mandate, we have seen the REC demonstrate yet another important policy function. The Seaside REC has shown that a single agency, albeit one that is ever sensitive to local capacity and needs, can serve as both helper and monitor. Working through local directors of special education, the REC has nurtured the local districts' sense of accomplishment and facilitated their sense of ownership for their special programs and exceptional children. The REC has managed to replace fear and resentment with responsibility and pride.

And so we learn

LESSON 7: THE NEED FOR HEAVY REGULATION AND TRADITIONAL COMPLIANCE MONITORING IS MINIMIZED TO THE DEGREE THAT LOCAL AGENCIES TAKE RESPONSIBILITY FOR AND PRIDE IN THEIR SPECIAL EDUCATION PROGRAMS.

The REC and the Seaside districts are the first to admit that they have some way to go before their special education services could be referred to as quality programs. However, they take a great deal of pride in the ones that they do have in place. Getting programs in place was the first step; they are ready for the next goal--developing quality programs.

The potential for reaching this goal, of course, is greatly enhanced by the presence of the REC. As their helper and monitor, the REC is there to work toward quality from the bottom up. Alternative courses of action now can be checked by the REC before one is selected. The guess work is gone. Moreover, the LEAs do not have to wait until they are monitored to find out whether choices they made three years ago are "legal;" they can be sure from day one. Not only does this reduce the atmosphere of fear, but it reduces the chances of harming children. The LEAs now can put the time formerly spent in worrying about staying legal to better use in improving programs and services.

And so we learn

LESSON 8: ALTHOUGH P.L. 94-142 REGULATIONS SERVED THEIR PURPOSE WELL IN ESTABLISHING LOCAL SPECIAL EDUCATION PROGRAMS, EXTENDING THE QUALITY OF THOSE PROGRAMS WILL REQUIRE AN APPROACH THAT CAN OFFER A HELPING HAND RATHER THAN A HEAVY HAND.

Appendix G

Site #5 Case Study

The Northern Slope Service Agency

THE NORTHERN SLOPE SERVICE AGENCY:
A CASE STUDY

The fifth of five case studies appended to
Interorganizational Special Education Programming in Rural Areas:
Technical Report on the Multisite Naturalistic Field Study

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

March 1, 1983

© 1983

Department of Special Education
School of Education
University of Kansas
Lawrence, Kansas 66045

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that agency."

TABLE OF CONTENTS

Page

LIST OF TABLES ii

LIST OF ILLUSTRATIONS iii

SECTION

1 Introduction to the Area 1
  Demographics and Descriptors 1
    A Tour Around the Area 1
  The Local Education Agencies 4
  An Introduction to the NSSA 6

2 NSSA Organization and Services 9
  The Governance Structure of Service Agencies . . . 9
    Membership 9
  Northern Slope Operations 10
    NSSA Services 10
    Personnel Roles and Responsibilities 12
  Funding 14
    LEA Revenues 15
    Special Education Funding 16
  Compliance and Monitoring 18
    Variances 18

3 Services for Handicapped Students 20
  Special Education Categories and Services 20
    Significantly Limited Intellectual Capacity . 20
    Perceptual-Communicative 22
    Significant Identifiable Emotional/Behavioral Disorders 22
    Gifted/Talented 22
    Service Patterns: NSSA and LEA Roles 22
  Staffing Handicapped Students 26
    Identification and Evaluation 26
    Placement and the Development of the IEP . . 30
    Review of the IEP 31
    Procedural Safeguards 32

4 Issues of Particular Concern to the NSSA 34
  Education: Right or Privilege 34
  Attitudes Toward the Handicapped 35
  Collaboration and Local Control 35
  The Pervasive Impact of Interpersonal Skills . . . 36
  Parent Participation 37
  Recruitment and Retention of Staff 38
  Boundaries: Natural and Otherwise 39

5 What Can Be Learned from the Case 41

LIST OF TABLES

Table Page

1 October 1981 Demographics 5

2 Possible Services and Proportions of Service Agencies Providing those Services 7

3 1981-82 LEA Participation in Services 11

4 NSSA Budget Items 14

5 Handicapped Student Demographics 21

6 State Requirements for Addressing Evaluation Areas of Concern 29

LIST OF ILLUSTRATIONS

Figure		Page
1	Map of the Northern Slope Area	3
2	NSSA Organizational Chart	8

AN INTRODUCTION TO THE AREA

Demographics and Descriptors

You are standing at the corner of Main and Cherry Streets in the town of San Carlos, population 7,000. You gaze southward at the cascading beauty of the mountains. Hundreds of miles to the south, on the other side of the mountains is the state capitol. Turning north, or east, you're 20 miles away from the adjoining states. To the west lie more mountains, more ruggedness, more beauty, and more isolation.

It's an area of stark contrasts: arid desert, farmland; wind-swept high plains, lowland valleys; grazing land, and alpine forests. Its people comprise three distinct cultures: Native-American, Mexican-American and Anglo. Area industries are ranching, mining, farming, lumber, and recreation. You can expect to find fewer than four people per square mile around here.

The people are multi-cultural; the industries are in economic trouble, and the schools struggle to provide the area students an education which some believe to be a right, yet others, a privilege.

They call this 5,500 square-mile area the Northern Slope: an area formed by both artificial and natural boundaries. Although the state holds the local school districts responsible for the education of handicapped students, it also provides for a system in which two or more school districts can expand and improve their educational services by creating a service agency to assist them. The Northern Slope Service Agency (NSSA) assists nine area school districts in a variety of ways, and eight of those in providing special education services. The borders of these nine districts, located in all or part of four counties, and the borders of the adjacent states all comprise the artificial boundaries. Its natural boundaries? The mountains . . . always the mountains.

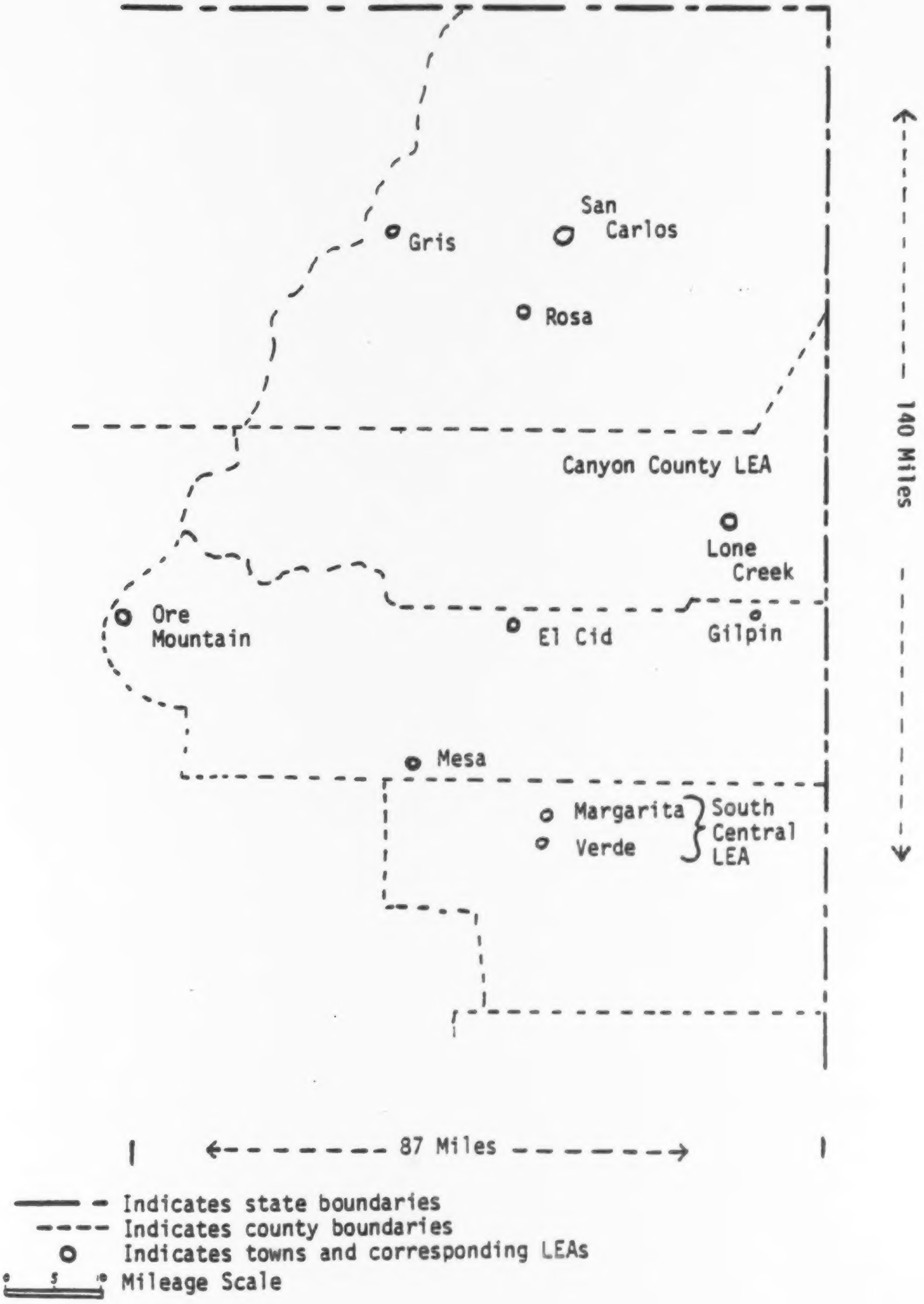
Figure 1 shows the Northern Slope area. The mountains divide the area into two distinct population areas: north and south. Most of the two minority cultures (about 15 percent of the total population) reside in the east end, in or near San Carlos, the largest town in the area. Most of the Anglo population also resides in the San Carlos area. Even fewer people live in the south. One of the southwestern towns is Ore Mountain, a town of 1,200 that has made a slow but successful economic transition from the now-plagued mining industry to tourism.

A Tour Around the Area

The roads rimming the perimeter of the area are twisting, two-lanes through breath-taking mountain passes. Unless you choose to travel north or further east through immense Indian reservations into other states, this is about all the car traveling you can do. It's hard for the visitor to imagine that the only links to the more populated flatlands and the state capitol are the TV news, the phone, the airplane, and the newspaper. In Margarita (South Central), residents receive the regional newspaper 36 hours after its printing. One doesn't drive to the capitol, one flies. Indeed, many local residents have never been there.

Eventually, after starting at San Carlos and coming full circle, one has passed through each of the nine local school districts: San Carlos (the largest), Gris, Rosa, Ore Mountain, El Cid, Mesa, the South Central Side (Verde and Margarita), Canyon County (located in the town of Lone Creek) and Gilpin (the smallest district). Between these towns are many farms and ranches, as well as old, dying mining projects and new endeavors like the dam project. However, the schools generally are the largest employers.

Figure 1. Map of the Northern Slope Area



San Carlos
Gris
Rosa
Canyon County LEA
Lone Creek
Ore Mountain
El Cid
Gilpin
Mesa
Margarita
Verde
South Central LEA
140 Miles
87 Miles
Indicates state boundaries
Indicates county boundaries
Indicates towns and corresponding LEAs
0 5 10
Mileage Scale

The Local Education Agencies

With the exception of San Carlos, the local schools, formally "Local Education Agencies," or LEAs, are small. Table 1 shows each district's organization, total membership, and student/teacher ratios.

The average student/teacher ratio across the nine LEAs is about 14 students per teacher. The smallest LEA, Gilpin, has 52 students across kindergarten through eighth grades. Seventeen local students go to high school in the neighboring state. By happenstance, Gilpin gets more in the way of state reimbursement funds than it has to spend the tuition charged by the LEA in the neighboring state. The closest LEA in the area, Canyon County, charges a hefty sum more in tuition. Thus it is much cheaper for Gilpin to make this out-of-state placement.

Three of the districts are consolidated: Gilpin, Canyon County and the South Central End. However, each of these was consolidated during the late 1950s in response to the state's School Reorganization Act.

With a median annual per capita income for the entire area of $8,000, tax money to support the schools is hard to come by. The state is less fiscally supportive than most. Federal dollars from the Elementary and Secondary Education Act's entitlement programs and from P.L. 94-142 (The Education for All Handicapped Children's Act) provide about 25 percent of the LEA's fiscal support for programs.

Table 1 also shows LEA building organizations. Most LEAs maintain one elementary, one junior high, and one senior high building. Administrative personnel are scant. Superintendents in two LEAs serve as building principals. Rosa's superintendent shares administrative responsibilities by employing one of his teachers in a part-time, assistant administrator role, termed "head teacher." This role is described in the next section. San Carlos obviously stands alone in many respects, including its organization. Its 2,866 students are spread across nine elementary schools, a junior high, and a senior high school.

All of the LEAs depend upon the NSSA for services--mostly assistance in special education. Cortez currently provides its own special education programs, although it does participate in the NSSA's media, library, and instructional resource services.

Table 1

Northern Slope Local Education Agency

October, 1981 Demographics

LEA	ORGANIZATION Level	 # of Buildings	MEMBERSHIP	STUDENT/TEACHER RATIO
San Carlos	K	1	2866	17.3
	1-6	8		
	7-9	1		
	10-12	1		
Rosa	K-6	2	543	17.5
	7-12	3		
Canyon Co.	K-6	1	348	14.2
	7-9	1		
	10-12	1		
Gilpin[1]	K-8	1	52	10.6
Gris	K-6	1	466	17.4
	7-9	1		
	10-12	1		
Mesa	K-8	2	312	13.5
	9-12	1		
Ore Mountain	K-12	1	175	9.5
South Central End	K-6	3	654	15.6
	7-9	1		
	10-12	1		
El Cid	K-8	1	401	12.9
	9-12	1		
Totals		34	5,817	14.3 (Ave.)

---

[1] Students attend high school in a neighboring LEA of an adjoining state.

An Introduction to the NSSA

The 1965 Service Agency Act permits, but does not require, the establishment of "regional educational service units designed to provide supporting, instructional, administrative, facility, community, or any other services contracted by participating members." Over 90 percent of the state's 181 LEAs are members of one of 17 service agencies. The array of possible services an agency could provide and percentages of agencies in the state providing them are listed in Table 2.

The NSSA provides 10 of the 14 services. Created in 1966, the NSSA first provided library/media and cooperative purchasing services for Canyon County, Rosa, Gris, and San Carlos. Expansion to the current nine LEAs occurred by 1970.

With the advent of the state's Exceptional Children's Education Act (ECEA) in 1972, the NSSA began providing special education support services. In 1975, P.L. 94-142 was passed, but the state's ECEA already had a headstart on the provisions called for in the federal law. For example, in 1973 the state required service agencies to employ a director of special education on at least a half-time basis. In 1976, the NSSA hired the current special education director.

The NSSA's professional staff consists of the NSSA Director, the Director of Special Education, who also directs the Instructional Resource Center; two psychologists, one serving the North Side and one the South Side; and two speech therapists, deployed in the same fashion as the psychologists.

The organization and deployment of these personnel, as well as their administrative relationships with the LEAs are shown in Figure 2. Direct services to handicapped students are provided and supervised by the LEAs. Although the psychologists and speech therapists work for the NSSA, they are supervised jointy by the NSSA's Director of Special Education and local superintendents and principals. Special education teachers are hired and supervised by the LEAs. Media and instructional resources are provided by local Instructional Resource Center (IRC) personnel with support from the NSSA's audio-visual technician and clerks (not shown). Other services are provided or maintained by the NSSA Director, the special education director and clerical personnel. Specific responsibilities and services will be detailed in the remaining sections of this case study. Next we look at the organization of the NSSA, and its local, state and federal relationships.

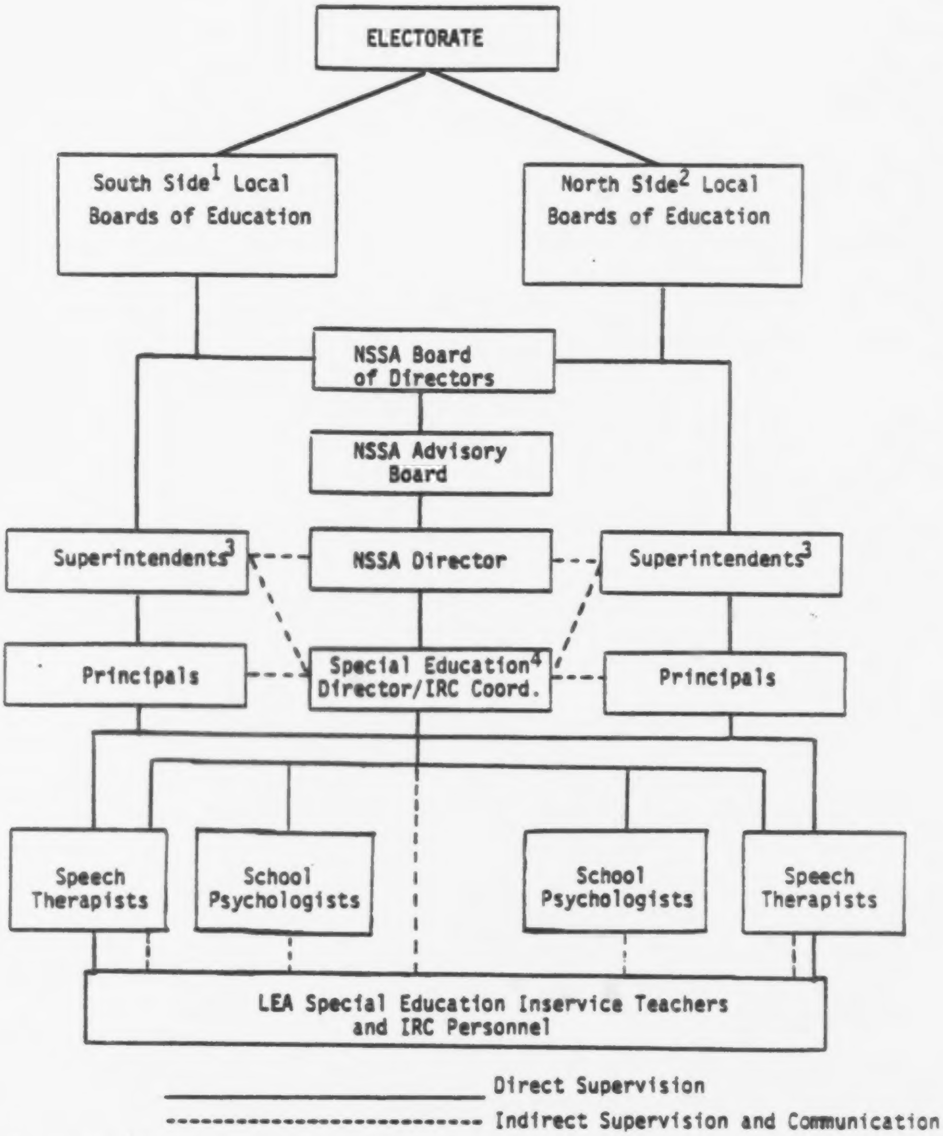
Table 2

Possible Services and Proportions of Service Agencies Providing those Services

	Service Description	Percent of Agencies Providing Services
1.	Special Education Services*	82%
2.	Library and Media*	82%
3.	Cooperative Purchasing*	77%
4.	Inservice/Staff Development*	77%
5.	Child Find*	65%
6.	Migrant Education	53%
7.	Instructional Resource Center*	53%
8.	Driver Simulators*	47%
9.	Adult Basic Education*	41%
10.	Title I	41%
11.	Title IV-C (Innovative Programs)	41%
12.	Gifted/Talented	35%
13.	G.E.D. Testing*	29%
14.	Bilingual Education*	12%

*Provided By NSSA

Figure 2. NSSA Organizational Chart


ELECTORATE
South Side[1] Local Boards of Education
North Side[2] Local Boards of Education
NSSA Board of Directors
NSSA Advisory Board
Superintendents[3]
NSSA Director
Superintendents[3]
Principals
Special Education[4] Director/IRC Coord.
Principals
Speech Therapists
School Psychologists
School Psychologists
Speech Therapists
LEA Special Education Inservice Teachers and IRC Personnel
Direct Supervision
Indirect Supervision and Communication

1 South Side = Mesa, Ore Mountain, and South Central
2 North Side = Rosa, Canyon Co., Gilpin, and Gris
3 Some superintendents also function as principals
4 The Special Education Director also functions as the IRC Coordinator

NSSA ORGANIZATION AND SERVICES

The Governance Structure of Service Agencies

The NSSA exists within a permissive context from the point of view of the State Education Agency (SEA). The Service Agency Act of 1965 was intended to be an organizational tool for the state's rural LEAs to combat geographic barriers such as distance and accessibility. The state is one of the largest in area, yet one of the smallest in population in the U.S. The state sought a mechanism that would help LEAs provide educational services equitably while maintaining the tradition of local autonomy. Consistent with state constitutional stipulations regarding complete discretion on the part of local boards in the prescription of curricula, the 1965 Act guaranteed LEAs the flexibility and autonomy to enter into contracts with individuals, agencies, or other suitable entities to provide educational services. Thus, all service agencies exist and function solely at the discretion of the participating LEAs. Except for certain state and federal regulatory requirements, the state does little to impinge upon this local discretion. Thus, one sees the opportunity for significant local control in all facets of a service agency's governance structure, beginning with the provisions for creating such an agency.

The boards of education of two or more school districts can form a service agency. When local boards want to establish an agency for the purpose of providing cooperative services, and they have so certified to the state's Commissioner of Education, the presidents of the participating local boards may call a meeting. The participating boards are required to seek from the commissioner any aid and assistance that may be required, so that a proper plan of organization for the agency is established. Thus, the state is given a mechanism for input into the formation of service agencies since the commissioner must ratify their organizational plans.

Participating boards also decide on the number of agency board members; the only state constraint being that the agency board may have no fewer than five members. LEA representation is up to the board itself. The NSSA Board includes one board member from each of the nine participating LEAs.

At its first meeting, the members of the board elect a president, vice-president, secretary, and treasurer. Terms of office ordinarily run two years. Service agency boards operate virtually as school district boards. Services are provided when two or more districts request them.

Membership

The agreement to establish a service agency may be amended to admit one or more additional school districts, community and technical colleges, or state-supported institutions of higher education at any time after its initial formation. To become a member, two requirements must be met. First, the governing board of the agency must certify by resolution a desire to be admitted. Second, the service agency must also agree to such admission via a resolution of its own.

Service agency composition can change over time as districts join and withdraw. Over the past 16 years, the Northern Slope Service Agency grew from four to nine districts, lost San Carlos for special education, and added Casa Grande College as an associate member.[1]

The state permits local districts to create or join service agencies "whenever feasible;" it neither requires nor discourages withdrawal. With a two-month notice and the completion of or release from its current contract obligations, a participating board of education may withdraw from the agency. A service agency may be dissolved by its members when all current contract obligations have been discharged. A member LEA may choose the services and may withdraw from any particular service with a 90-day notice. This discretion makes long-range planning difficult without experience and cooperative interactions between member districts and the agency.

An advisory board which is composed of LEA superintendents meets separately and makes recommendations to be voted upon by the NSSA Board of Directors. Superintendents and NSSA administrators see this arrangement as an efficiency measure.

Northern Slope Operations

NSSA services, shown in Table 2, are agreed upon by consensus of all nine LEAs. However, LEAs can still select those in which they participate. For any given service, including special education, not all LEAs participate, and particular patterns of local participation may vary on a yearly basis.

Table 3 displays NSSA services and the LEA's participation in them as of the 1981-82 academic year. It can be seen that considerable variability exists with regard to the number of services in which each district participates. San Carlos provides its own special education services; however, it does participate in the NSSA's library/media, GED and the Instructional Resource Center (IRC) services. All of the other LEAs participate in the NSSA's special education services.

NSSA Services

The NSSA provides special education support services that are intended to buttress those direct services provided by the LEAs. The LEAs' special and regular teachers and aides are supported by the NSSA's psychologists and speech-therapists. Consistent with the local control built into the NSSA and other service agencies, districts hire, supervise, and evaluate their own regular and special education teachers; however, the NSSA provides direction and advice in regard to hiring, supervision and evaluation. Before addressing special education services, we describe the NSSA general services.

---

[1] An "Associate Member" participates by providing courtesy services, such as library access, as agreed upon by all participating agencies. It does not share in the fiscal support of the service agency, nor in its governance and revenues.

Table 3

1981-82 LEA Participation in Services

Service	Casa Grande College	Canyon County	Rosa	Gris	Gilpin	San Carlos	Ore Mountain	Mesa	South Central	El Cid
Special Education		X	X	X	X		X	X	X	X
Library/Media & Resource Center		X	X	X	X	X	X	X	X	X
Cooperative Purchasing		X	X	X	X		X		X	X
Inservice/Staff Development[1]	X[2]	X	X	X	X		X	X	X	X
Driver Simulator		X	X	X		X		X	X	
Adult Basic Education/ GED Testing		X	X	X	X	X	X	X	X	X
P.L. 94-142 (VI-B: Child Find)		X	X	X	X		X	X	X	X
ECEA Entitlement Programs-										
Title VII: Bilingual Education					X					
Other Services- Group Insurance		X	X	X			X	X	X	X
Legislative Liaison	X	X	X	X	X		X	X	X	X
Recruitment/Applicant Screening		X	X	X	X		X	X	X	X

[1] Smith College (30 minutes from the area) offers certification coursework for LEA special education teachers.

[2] Casa Grande College offers library access.

Media/Library and IRC. The media/library and Instructional Resource Center are administered by the director of special education. He employs a library clerk and a van driver to maintain records and make weekly pick-ups and deliveries. Library holdings are what one would expect: books, films, filmstrips, audio- and video-tapes, and the like. All nine of the districts participate in these services and are satisfied with these services.

Inservice/Staff Development. Aside from the certification courses offered at Smith State College, the inservice education activities are arranged annually by the special education director according to LEA requests. Inservice days range from one to eight depending on the LEA and how many days it wants to devote to inservice. In recent years, one day a year has been devoted to topics related to P.L. 94-142 and the education of handicapped students.

Cooperative Purchasing. Through the NSSA, schools can bid collectively for educational materials, cafeteria goods, foodstuffs, and custodial supplies. The NSSA director handles these agreements and transactions and the NSSA absorbs the administrative costs in its core budget. Some local administrators, however, will at times decline cooperative purchasing; they elect instead to arrange the purchase of food through local businesses to support their economies, and to avoid occassional storage problems when shipments arrive at inconvenient times.

Driver Simulator. The NSSA owns a driving simulator and makes it available to participating LEAs for 6 weeks on a rotating basis.

Adult Education/GED Testing. About 75 adults attend adult education programs at several Northern Slope high schools each year. The NSSA administers the GED test to these students.

ESEA Entitlement Programs. Although other service agencies offer itinerant Title I services, the Northern Slope LEAs each qualify and maintain at least one Title I teacher. NSSA special education support staff informally support Title I teachers employed by individual LEAs.

The NSSA also has assisted districts with grant writing services for Title IV-C (Innovation). However, IV-C monies are no longer available. Some districts had been successful in obtaining these funds.

Only one of the districts, Gilpin, qualifies for bilingual education funds under Title VII and as such employs a qualified bilingual teacher. Other LEAs either go without or hire a Spanish-speaking general education teacher. The NSSA assists in clerical management of federal funding, but has no role in program implementation.

Personnel Roles and Responsibilities

We've already introduced the general organizational nature of the NSSA and its relationship to the LEAs comprising it. Personnel arrangements similarly reflect cooperative linkages between the LEAs and the NSSA. NSSA personnel involved in these linkages are: the NSSA Director, the NSSA Special Education/IRC Director, and NSSA support staff. Figure 2 shows the lines of responsibilities among these personnel roles.

The NSSA Director. The NSSA Director is principally accountable to the NSSA Board but interacts most often with the advisory board. The advisory board conducts virtually all specific planning activities and then presents those plans to the NSSA Board for formal action. It is important for the NSSA Director to work well with superintendents who comprise the advisory board. His low-keyed approach and personal regard for superintendents allow him to be effective in the midst of a client-controlled and thus fluid service organization arrangement. Most of the local administrators look to him for their personal "staff development." Innumerable informal conversations as well as the monthly advisory board meetings during the school year have enabled local superintendents and the director to form effective working relationships with one another.

At the advisory board meetings, superintendents share their problems with the director who, as one administrator put it "never says no." They rely on him to improve their schools' operation. His philosophy: if you see even a potential problem, "don't run and hide from it; find out what it is and do something about it."

Special Education Director. The special education director devotes most of his time to the duties prescribed by the Exceptional Children's Educational Act. The regulations make him responsible for "the development, implementation, maintenance, monitoring, and evaluation of the programs and services required or permitted by the (Act)." The special education director helps the LEAs administratively through record-keeping, assistance in compliance with state and federal regulations, and program support services. He attends most staffings for students, maintains referral and program data, and consults with local superintendents and principals regarding local programming and personnel. The superintendents count on him to oversee, but not direct their special education programs.

Originally from the area, the director's most effective tool is what one might call a "sixth sense" as to the middle ground between a district's discretionary power and the needs of its handicapped students. His rule of thumb is to "get the job done" in a way that's "best for the student, and best for the staff."

NSSA Support Staff. Support services are delivered by two teams of support staff consisting of the North and South Side psychologists and speech therapists. They are itinerants who visit each LEA once a week. In a sense, they work for two bosses: the LEA superintendents and the NSSA Special Education Director. They are paid by the NSSA through state reimbursement funds and, since the NSSA is operated at the discretion of the LEAs, these support personnel are responsible to the district they work in on any given day. For the most part, this works well, although not without occassional disagreements related to disproportionate service needs across LEAs.

Although the special education director is effective at mediating such disputes, often before they happen, a few do turn into problems.

For example, since an LEA "shares" the costs of the speech therapist's services, it carefully watches its share of those services. Because districts pay for support services on an equal shares basis, because case loads will vary across districts, and because service providers try to allot their time across LEAs on the basis of case load rather than equal shares per district, an LEA's cost for services at times is disproportionate to the number of students receiving those services. Mediation and resolution of such discrepancies are primary aims of the NSSA. Thus, personnel providing support services must also approximate this middle ground between the needs of the students and those of the LEAs.

Whether or not a particular student receives the amount of services called for by the nature of the disability depends on: the amount of lattitude an LEA will permit in disproportionate sharing of services and costs, the capabilities of the NSSA and special education directors to mediate and resolve these problems proactively, and the interpersonal effectiveness of all NSSA personnel who find themselves in this predicament.

Funding

Table 4 shows the NSSA's major budget lines, and their relationship to the total budget of $618,000.

Table 4

NSSA Budget Items

Service Category	Descriptors	Proportion of Total
Core Administration	Board expenses, director's salary, audit expenses	25%
Library/Media	Operation, maintenance, purchase, repair	21%
Driver Simulator	Leasing, supplies, maintenance	6%
Support Services	Special education support personnel and Director's salaries, operations, travel, administration	48%

Services such as recruitment/applicant screening, legislative liaison, inservice/staff development, and adult basic education are embedded within the Core Administration or Support Services lines. Services related to the ESEA Entitlement programs, essentially administrative, also are embedded within these line items.

The methods involved in the NSSA's generation and distribution of revenues are relatively simple. Aside from P.L. 94-142 monies, competitive federal grants, and an annual flat grant from the state of $10,000[1] (earmarked for core administration only), the NSSA depends solely on a base contribution and prorata service fees charged to each district.

The NSSA Board sets these base and prorata shares--in this instance, 35 percent/65 percent. As such, each of the nine LEAs pays equally for 35 percent of the total service costs--including those related to special education. The remaining 65 percent is prorated on the basis of total enrollment per LEA. A district's enrollment is calculated on the basis of the highest of four average daily attendance (ADA) figures: (a) the ADA for October of the current budget year, (b) the ADA for the year preceding the budget year, (c) the ADA two years preceding the budget year, or (d) the average of the ADA across the three years preceding the budget year.

The NSSA must expend all contributions as budgeted for each academic year. LEAs have until 90 days before the NSSA's July submission of the budget to the state to confirm or pull out of service agreements.

LEA Revenues

The 1973 School Finance Act authorizes each LEA to spend up to an annual Authorized Revenue Base (ARB). This is the amount per pupil that an LEA is authorized by the state to spend if they receive state aid. Of course, wealthier districts usually can raise funds in excess of their ARBs just by levies on local property taxes. Poorer LEAs cannot realize a local contribution of such magnitude. For the 1981-1982 year, the statewide average was approximately $2,100. ARBs of the Northern Slope LEAs were of comparable levels.

Each district submits to its county commission the amount of revenue needed to operate the schools for the next year. In the Northern Slope, this involves separate decisions on the part of four counties. The respective county commissions specify levies against the assessed valuation of taxable property within each district's boundaries. The district's "wealth" is then computed by dividing its assessed valuation by its enrollment.

Enter the state's "Equalization Aid." State aid is determined according to an LEA's "wealth" as defined above. The state pays the difference between monies generated by the revenues and the ARB. In general, poorer LEAs receive more aid than the wealthy districts. The wealthy LEAs in the state may generate revenues from taxes that exceed the ARB. These districts usually earmark the difference for capital investments: buildings, buses, etc. Poor districts, however, apply for Equalization Aid which essentially computes to the difference between their tax revenues and the ARB. They do not have the luxury of tax revenue surpluses that can be applied to long-term capital improvements. Those contending that education is a fundamental right believe that this equalization method is unfair since the amount of reimbursement to poor districts does not coincide with their fiscal needs were they to provide students with curricula and programming commensurate with wealthy districts.

---

[1] To qualify, the state requires service agencies to serve school districts (a) with a combined total enrollment of no fewer than 4,000 students, (b) in two or more counties, and (c) with a combined total valuation for assessment of not less than 60 million dollars or school districts with a combined total are of not less than 4,000 square miles.

The dilemma is well illustrated in one of the LEAs where a uranium mine closed in 1980 leaving nearly 75 percent of the working population jobless. The district saw an enrollment decline of 200 percent over a two-year period. Thus, the LEA's student enrollment and total revenues based on the ARB began to decline. Some of the remaining residents still have not found jobs. The effects of this situation render the LEA "poor," not only in regard to what it can spend for current needs, but also in regard to its advance planning and economic outlook in the future.

Special Education Funding

To this point, we have discussed the general education funding, and the determination of local contributions to NSSA operations. We turn now to the consideration of state and federal regulatory requirements for the delivery of special education to handicapped students (a local responsibility) and state and federal fiscal reimbursements for those services.

The NSSA role in special education is to assist its participants in providing special education with quality and fiscal efficiency. Keep in mind that responsibilities related to special education rest with the LEAs. The state's 1974 Exceptional Children's Education Act (ECEA) requires service agencies to qualify as "Administrative Units" in order to be eligible for state (ECEA) or federal (P.L. 94-142) reimbursement funds. Criteria for qualification are:

1. Enrollment of 4,000 pupils in average daily membership, or 400 handicapped children in special education programs.
2. Boundaries encompassing a geographic area of manageable size considering the location of the population, topographical hazards, distance, weather, and transportation conditions.
3. Employment of a qualified director of special education, employed no less than half-time in this capacity.
4. Provision of administrative support for special education programs which will allow compliance with the rules of the state department.
5. Development and implementation of a state-approved comprehensive plan. Since none of the LEAs participating in special education services qualifies alone for reimbursement from P.L. 94-142 monies, the NSSA also submits a "consolidated application" for these funds to the state.

The NSSA, duly qualifying, serves as an administrative unit in the eyes of the state. For reimbursement and compliance monitoring purposes, it is accountable along with each of the eight LEAs that purchase its services and provide their own special education teachers. San Carlos is, itself, also an administrative unit. Essentially, the NSSA serves as a "middle-man" with regard to both reimbursement and compliance monitoring.

State Reimbursement. The NSSA receives about 30 percent of its total revenues from the SEA. Aside from the $10,000 flat grant for core administration, the remaining monies are ECEA reimbursement funds paid on percentage of service-cost (as opposed to per-student) basis.

Reimbursable service costs are 80 percent of that portion of the salary of personnel whose roles are related to the delivery of special education services. These include the administrator and assistant administrator of special education in an administrative unit, supervisors of special programs, teachers of special classes, teachers of special resource rooms, teachers of special itinerant programs, school psychologists, school social workers, school audiologists, occupational therapists, physical therapists, special education instructional aides, special education instructional materials specialists, speech therapists, mobility specialists for the blind, special education secretaries, and registered school nurses. Although the state allows these roles to be reimbursable, the NSSA must hire any needed personnel on an ad hoc basis with the exception of the director, the school psychologists, the speech therapists (special itinerants), and the secretary.

Other costs that are supposed to be reimbursed at this 80 percent level include: (1) special transportation provided for handicapped children only, after other funds reimbursed by the state are deducted; (2) home-to-school or hospital-to-school equipment; (3) consultation and evaluation services provided by psychiatrists, psychologists, and social workers employed by mental health clinics and centers approved by the department; (4) inservice training of regular classroom teachers to provide special education services to children within regular classrooms insofar as is practicable and efficacious; (5) for each child so accepted, the average cost per pupil of educating children with similar handicaps in any unit which accepts a child from another administrative unit in one or more of its special education programs; (6) mileage expenses incurred by psychiatrists, psychologists, speech therapists, and social workers in traveling from their base of operations to other attendance centers in the course of fulfilling job requirements; or (7) any contract for services which would be reimbursable if such services were provided by the administrative unit, except instructional services. The state also is supposed to reimburse 50 percent of the costs of materials for the education of exceptional children or $200 per special education teacher, whichever is less.

Rarely are sufficient funds appropriated. The 80 percent state figure for salaries in reality has weighed in closer to 40 percent. Indeed the state, in the event appropriations are insufficient to cover reimbursements, maintains a procedure whereby all approved reimbursements are prorated on the basis of total claims submitted in proportion to total funds available for reimbursement. Available reimbursements for appropriate NSSA personnel are applied toward those costs by the NSSA. Reimbursements for personnel on local payrolls are received by the NSSA (under the auspices of its administrative unit status) and funneled to the eight participating LEAs.

Federal Reimbursement. The NSSA receives nearly 25 percent of its revenues from federal sources, principally P.L. 94-142 flow-through funds. The NSSA applies both for P.L. 94-142 flow-through funds and for ECEA funds. The state treats compliance with the ECEA as compliance with P.L. 94-142 and, as such, renders its flow-through funds according to that determination. The NSSA receives approximately $85,000 in P.L. 94-142 flow-through funds. In addition, the NSSA gets P.L. 89-313 funds which provide an incentive of $600 per student to integrate deinstitutionalized students.

Entitlement Programs. Entitlement funds are funneled to local districts for Titles I and VII. As mentioned, Title IV-C funds have been received by LEAs through competitive grants.

Compliance and Monitoring

The State Department of Education monitors the operation of special education programs in several ways. It conducts an analysis and evaluation of all reports, applications or other data submitted by the administrative units to the department. The state conducts periodic on-site reviews of the actual programs and services being provided. However, the scheduling of such reviews, e.g., once every three years, is not specified in the regulations. Within 60 days following such reviews, written evaluations are prepared concerning the extent to which the programs and services of the administrative unit conform to good educational practice, the administrative unit's comprehensive plan is being followed, and the intent of the ECEA is being satisfied. Specific suggestions for improvement are also included in the written reports.

Since the LEAs and the NSSA are evaluated together as a unit, the written plans are consolidated; one is the comprehensive plan submitted to the state, whereas the other is a consolidated application for P.L. 94-142 monies that flow-through the state department. The NSSA prepares both of these documents.

Variances

Some states virtually make fiscal reimbursements contingent upon compliance. In this state, an administrative unit that believes non-compliance of a particular program is justified by "indigenous conditions" can file a written claim for a variance with the SEA. The request must be filed with the SEA within 30 days after receipt of notice of determination of non-compliance, or 30 days prior to implementation of programs or services which are believed to be justified by the unit. It also can be filed voluntarily rather than in response to a determination of non-compliance.

The request for variance must specify the section of the state regulations from which a variance is requested and identify those conditions indigenous to the unit, or other needs or rationale justifying such request. Specific methods by which the unit will evaluate and report the educational effectiveness of the variance proposal also must be explained.

The variance request is granted if the proposal, given the conditions which prompt the request, will secure for the affected handicapped children an adequate educational program. Upon request from the SEA, the unit must provide additional relevant information or documentation which is necessary in order to render a decision on a variance request.

The state's Director of Special Education has the authority to approve programs that may not comply without requiring a variance request. Although not in strict compliance, the program's particular circumstances would constitute, in his/her opinion, service delivery to handicapped students that affords "reasonable" compliance. A written record of such approval is provided to administrative units. Thus, decisions about variances in compliance ultimately rest with the state director. However, compliance decisions of this nature rarely are accompanied by extra resources to improve the particular program. Instead, the state ultimately approves or disapproves programs and, in the latter case, decreases or revokes reimbursement without providing assistance in strengthening program deficiencies.

SERVICES FOR HANDICAPPED STUDENTS

We have discussed NSSA's functions, the roles of its personnel, and its costs and funding. Now we are ready to see what all of this brings to bear upon services for the area's 261 handicapped students. Table 5 displays the number of handicapped students per district by handicapping condition.

Special Education Categories and Services

The identification criteria for the handicapping conditions specified on Table 5 are regulated by the state. Whereas some states have revised their programs in the direction of non-categorical special education, this state has moved the opposite way with respect to mildly handicapped students. Non-categorical programs typically serve combinations of mildly learning disabled, mildy emotionally disturbed, and mildly mentally retarded students in a resource room setting. This state served learning disabled students in a resource room program for the "Educationally Handicapped." Several research studies of the state's patterns of identification and placement conducted during the late '70s revealed that some students in such programs did not meet federal (P.L. 94-142) criteria for learning disabilities even though they met the state's somewhat more general criteria for Educational Handicaps. Thus, the 1981 changes in the regulations attempted to tighten the criteria by adopting categorical identification practices with respect to learning disabilities, emotional disturbance, and for mental retardation, as well as identification criteria for gifted and talented students.

These changes also reflect a somewhat clearer alignment with P.L. 94-142 criteria. The new categorical designations for mental retardation, learning disabilities and emotional disturbance, as well as for gifted and talented, are presented below.

Significantly Limited Intellectual Capacity (SLIC)

The state has shown a tendency historically of avoiding the label "mental retardation" (MR) with respect to student classification. With the 1981 revisions of the ECEA regulations, and based in part on guidelines established by the American Association on Mental Deficiency (AAMD), the state changed the label to "Significantly Limited Intellectual Capacity." Identification for educable and trainable levels within SLIC is not apparent in the regulations. Instead, the criteria are based on measured intellectual functioning of less than 1.75 standard deviations below the mean and significant deficits in adaptive behavior. The cut-off of 1.75 standard deviations translates to an IQ level approximately three or four points higher than that called for in the federal and AAMD definitions; and there are no criteria set forth for identifying moderately or severely retarded students. Presumably they are identified as "multiply handicapped"--a classification that requires only that a student demonstrate some combination of six handicapping conditions including SLIC, sensory and physical handicaps.

Table 5

Handicapped Student Demographics

Local[1] Education Agency	SLIC[2]	SIEBD[3] (ED)	Learning Disabled (P-C)[4]	Homebound/ Hospitalized	Physically Handicapped	Severely/ Multiply Handicapped	Visual/ Hearing Impaired	Speech Impaired	Preschool Handicapped	Total Average Daily Membership	Total Enrollment of Handicapped Students	Total Percentage of Handicapped Students
Gilpin	0	0	3	0	0	0	0	5	0	52.5	8	15
Ore Mountain	0	6	6	0	0	0	0	10	0	175.0	22	13
Mesa	3	2	10	0	0	1	0	6	0	312.0	22	7
Canyon County	0	1	21	0	1	2	0	13	0	348.5	38	11
El Cid	0	2	20	0	0	0	0	16	0	401.0	38	9
Gris	0	0	13	0	0	0	0	17	0	466.0	30	7
Rosa	4	0	23	0	0	0	0	15	0	543.0	42	8
South Central	0	5	32	0	0	0	0	15	9	653.5	61	9
Total	7	16	128	0	1	3	0	97	9	2,951.5	261	9

[1] San Carlos not included.

[2] Significantly Limited Intellectual Capacity

[3] Significantly Identifiable Emotional Behavioral Disorder

[2] Perceptual-Communicative

Perceptual-Communicative (P-C)

Perceptual-Communicative Disorders was established by the same revised regulations. This classification replaced "Educationally Handicapped" with more specific criteria to better serve learning disabled students and to combat the overrepresentation of minority students in programs for the educationally handicapped. The rationale was that these new criteria will allow staffing committees to differentiate learning problems due to perceptual or language deficits from those due to cultural differences and economic disadvantages. The identification criteria align consistently with the federal definition of learning disabilities.

Significant Identifiable Emotional/Behavioral Disorders (SIEBD)

The old EH classification also failed to distinguish between children with emotional problems and those with learning disabilities. Thus, complementary to the above two classifications, the classification of "Significant Identifiable Emotional/Behavioral Disorders" was established.

The term "identifiable" is important here. Since the state sought more specification in its guidelines, it attempted to set forth more criteria than does P.L. 94-142. These criteria are: (a) behavior which is dangerous to the child himself and/or others; (b) behavior which seriously interferes with the child's learning, or that of his classmates; (c) inability to retain academic information; (d) significantly limited self-control; (e) lack of positive and sustained interpersonal relationships; (f) persistent physical complaints related to stress and/or anxiety; (g) pervasive moods of anxiety or depression; (h) persistent patterns of bizarre and/or exaggerated behavior reactions to routine environment; or (i) extended periods of time with observable withdrawal that has no apparent positive coping aspect. Only (e), (f), and (g) are included in the 94-142 regulations. These regulations also include criteria not specified by the state. These are an inability to learn which cannot be explained by intellectual, sensory, or health factors, and inappropriate types of behavior or feelings under normal circumstances. Thus the state's criteria are approximate, but are not identical, to federal criteria.

Gifted/Talented

The 1981 revisions to the ECEA regulations added the area of Gifted and Talented. None of the nine districts offers this program. State criteria for eligibility include teacher nomination and measured intellectual performance at two or more standard deviations above the mean. Each LEA depends upon its regular staff to provide enrichment for any possibly gifted students. Until an identification mechanism is in place, the area will have no gifted programs.

Service Patterns: NSSA and LEA Roles

As can be seen in Table 5, the sparcely populated Northern Slope area conceivably could have no identified handicapped students for a particular category in any given year. Sparcity along with outside-district patterns are contributory factors. For example, moderately and severely handicapped students, often referred to as low-incidence populations, have an even lower prevalence in sparcely populated areas. When services for such a student are required, LEAs contract for services with San Carlos, and students are served at the self-contained Stanton School where special education and necessary related services are available.

It is also the case that some LEAs tend not to identify some potentially mildly handicapped children. This is due in part to the problems encountered in sharing NSSA support personnel, and, in some cases, a reluctance of LEAs to identify students for whom such a label as "mentally retarded" would be untenable--especially if the student were to be tested nine months subsequent to labeling and score in the normal range. It is also partly a function of particular attitudes toward special education--attitudes related to belief systems about what traits and characteristics comprise a handicap and whether children who some call mildly handicapped are indeed handicapped.

Before discussing the mechanics and politics of identification, placement and review, we present eight general placement options and their descriptions.

1. Consultant Services. These are services in the form of aid and assistance to the classroom teacher, who is primarily responsible for the child's educational program. Typically, the two NSSA psychologists provide this consultation to regular or special education teachers and to principals.

Since demands for psychological evaluations tend to take approximately half of the psychologists' available time, consultative needs of LEAs typically exceed the amount of time psychologists have to meet those needs. Two LEAs (Rosa and Mesa) utilize the "Head Teacher" role relative to teachers' consultative needs. Although the head teacher's major responsibility is still that of regular classroom teacher, he or she assists in: maintaining a liaison between administrators and teachers, troubleshooting discipline problems, and organizing and operating staffings for handicapped students. The last role meets federal and state guidelines since this teacher is a "designee" of the chairperson (superintendent or principal) of the staffing committee. The former roles of liaison and troubleshooter are consultative.

The increasing consultative functions of the psychologists and head teachers probably fill the vacuum first created two years ago when the NSSA dropped a position which was termed "learning specialist." Since these individuals were employed by the NSSA, they, like the psychologists, served in an itinerant capacity. They assisted regular and special educators in IEP development and the selection of instructional materials. They also assisted psychologists and speech therapists in educational evaluations. As we shall see, these personnel were seen as useful by local administrators, but not by many of the teachers to whom their services were geared.

Contrary to expectation, the demise of this learning specialist role was not due to defunding, but rather to its decreasing need as expressed by teachers. In each of the eight LEAs that participate in NSSA services, staff are close-knit and the personality of itinerant personnel is of crucial importance. Most agree that functioning in an itinerant capacity is at best difficult and demanding. To a large degree, an itinerant's effectiveness depends upon his/her ability to establish rapport with colleagues. Whereas one of the learning specialists was "good" and "knew PR," others were less than effective.

Frequently, regular teachers discuss ways of better serving students with other teachers housed in their own building: Title I teachers and special education teachers depend on their communication skills and practical knowledge. The NSSA support staff also are consulted. Thus, interpersonal communication appears to be an important factor not only with respect to role effectiveness but also to the very existence of particular service roles.

2. NSSA Support Services. NSSA support staff can provide direct service to students for a specified need as indicated by the IEP, e.g. speech therapy, or psychological evaluations. They also are involved in IEP staffing committee tasks. With the discontinuation of the learning specialist role, NSSA support staff are the two psychologists and the two speech therapists. As mentioned, the North Side psychologist and speech therapist serve five districts (Rosa, Canyon County, Gilpin, El Cid, and Gris) and the South Side psychologist and speech therapist serve three (Mesa, Ore Mountain and South Central).

The two psychologists provide indirect services in the form of consultation, as described above. Yet, at least half their time is spent conducting and interpreting psychological evaluations. Their major concerns are obvious: a heavy caseload of students needing evaluations coupled with the need to provide consultation due to the loss of the learning specialist role.

Similar concerns are reflected by the speech therapists. The maximum load for a speech therapist is 50 students--although they'll work with more. With a load of 50, the typical student needing articulation therapy is seen once a week. Teachers and administrators have no qualms about the quality of services, only their quantity. Like the psychologists, the speech therapists are spread so thin that they are frustrated in not being able to serve more students. Theoretically, a speech therapist could work with many more students classified as P-C and SLIC; yet he or she would still be responsible for those students with articulation problems, to say nothing of his/her IEP staffing responsibilities.

3. Resource Rooms. Each LEA has at least one resource room that can serve all mildly handicapped, predominantly those students identified as P-C. Students receive academic instruction in the resource room usually for an hour each day. The teacher is required to be skilled not only in direct instructional techniques but in the orchestration of the instructional components of the IEP. This involves working closely with parents and regular classroom teachers.

Regular teachers interviewed typically sing praises of the resource teachers. Resource teachers are seen as willing to devote time to the regular classroom teacher. They help in problem-solving and trouble-shooting as well as just listening. Parents also appear satisfied with the instructional competence of these teachers, as well as the efforts they make to involve the parents in the IEP process.

4. Self-Contained Classrooms. Only San Carlos provides self-contained classrooms. Students served here are mildly retarded as well as moderately to severely handicapped. San Carlos operates the Stanton School for moderately and severely handicapped students. Local districts contact the NSSA Special Education Director who arranges San Carlos placements and the tuition agreements between San Carlos and the sending district.

With respect to mildly retarded students, those who are identified typically attend resource rooms in their home LEAs. Some are placed in self-contained classrooms. A few are placed in San Carlos. As with the moderately and severely handicapped, LEAs pay San Carlos tuition for these services.

5. Work-Experience and Vocational Education Programs. This is a secondary school program based on the philosophy that supervised work experience within the community can best meet the educational needs of some children. Currently, such a program operates in the South Central LEA. Mesa students also attend this program with Mesa paying tuition to South Central. The teacher works half time as a biology and chemistry teacher and half time as a work-study coordinator. A declining economy makes finding placements in the two counties difficult. Yet, she is able to find work experiences for her students. These placements are typically in the afternoon and augment morning in-class activities. Most of the students served have been identified as P-C or SLIC.

Canyon County operates a vocational education program including an agricultural education class in which mildly handicapped students (again, predominantly P-C) are mainstreamed. One of its teachers believes handicapped students should be instructed separately. The teacher feels that the presence of handicapped students in class with their non-handicapped peers is hurting those peers. The teacher and the LEA believe it would be more efficient for the handicapped students to have their own agricultural education class.

Three of the LEAs in the same county as San Carlos send many of their secondary students to the vocational-technical school near San Carlos. In one LEA, about half of its juniors and seniors go to the vocational school in the morning followed by their afternoon classes at the home LEA.

With respect to the remaining LEAs, South Central and Mesa cooperate to provide their students with the work experience program, and Canyon County has the agricultural education program. Ore Mountain does not provide vocational programs. Ore Mountain's secondary principal indicated that most of his students are college bound and, thus, do not require vocational education.

The state reimburses LEAs which in turn reimburse employers for a $3.00 per hour salary paid to work study students identified as SLIC. Employers get "community service and free" labor as benefits of this funding. Currently, four area students are "funded" under this arrangement.

6. Community Center Board Program. CCB operates a local program in San Carlos, funded under the Department of Institutions, for severely-multiply handicapped persons of all ages. It has been intended as an alternative to institutional placement. The CCB charges tuition to the NSSA which is, in turn, reimbursed through state funds. Again, actual reimbursement is usually not at the level authorized. Students are placed usually at preschool age. The CCB contracts with the sheltered workshop in San Carlos. Adults are placed in sheltered workshop facilities which are "self-sufficient money-makers."

7. Home/Hospital. Home or hospital based educational services are provided upon recommendation of the staffing committee. The special education director arranges these provisions as needed, usually hiring part-time teachers to provide instruction.

8. Institution Placement. Institutional placement is arranged through a multi-agency agreement if need arises. This is usually a last-resort effort and rarely has occurred.

Staffing Handicapped Students

The state requires that the staffing process should be responsive to the major features of P.L. 94-142, including a free, appropriate education for all handicapped students in the least restrictive environment. This implies: (a) fair, unbiased assessment for identification, (b) zero-rejection of any handicapped student, (c) placement with nonhandicapped peers to the maximum extent appropriate, (d) the development, implementation, and annual review of an Individualized Educational Program (IEP), (e) parent participation in this process, and (f) the child's right (via his/her parents or guardians) to procedural due process safeguards against inappropriate identification, placement, and programming.

Forced adherence to these intents is imprudent in the Northern Slope area because of the permissive parameters within which any state service agency must operate and the population sparcity of the area. Of utmost importance is the special education director's leadership and resourcefulness. We seek here to provide a walk through of the IEP staffing, showcasing the roles of NSSA and LEA personnel as well as underscoring the importance of the director's relationships with the LEAs, their personnel, and those of other agencies. The presentation is organized around the IEP staffing process: Identification and Evaluation, Placement and the Development of the IEP, Review of the IEP, and Procedural Safeguards.

Identification and Evaluation

Procedures for locating, screening, identifying, evaluating, and placing handicapped students are subject to state and federal regulations assuring that the particular administrative unit (the NSSA) locates and, in an unbiased fashion, identifies all handicapped children from birth to 21,[1] particularly those previously unserved and those with the most severe handicaps. The NSSA provides for two sets of procedures, orchestrated through LEA-based staffing committees. The first is Child Find which was funded by P.L. 94-142 and Title VI-B monies and is now locally supported. The second is in-house referral carried out in each LEA.

Child Find. Out-of-school child-find activities have been in place for five years. These typically center on community awareness of special education services and procedures and are carried out through radio/TV announcements two or three times yearly, newspaper coverage of activities in special programs, and flyers distributed to local public and private agencies. The execution of these activities are based on agreements via the NSSA board. The emphasis is primarily on handicapped preschool children. Title VI-B funding levels were such that because of geography and sparcity, only one of the two geographic areas (e.g., the South Side) is earmarked per year. Thus, available resources were rationed in order for some degree of child-find activity to be in place. Now, LEAs support their own, more consistent with child find procedures. The NSSA encourages local administrators to engage in the following in-school child-find activities: (a) review all children who score 10 percentile or lower on locally administered standard achievement tests, (b) conduct screening from kindergarten to third grade (and for all new students), (c) participate in in-service of staff members as to referral procedures and behaviors indicative of possible handicapping factors, (d) conduct health screening (school nurse), and (e) request academic and perceptual screening.

Referral. Any person or agency can initiate a referral. However, the usual "flow" of information begins with the regular classroom teacher who refers a student via the building principal. He/she reviews the referral and, if he/she deems necessary, notifies the student's parents and schedules a "Pre-assessment" conference. At this conference an attempt is made to identify the educational problem, if any; explore alternative strategies to assist the teacher; provide information, if necessary, to assist the assessment team; and designate appropriate personnel to follow-up on conference suggestions and set time-line for follow-up. The principal or his/her designee, the child's teacher, and the building special education representative participate in this conference. Parents are notified by phone and in writing and are invited to attend. However, at the pre-assessment stage, their attendance is not mandatory.

Prior to any individual assessment being administered by any representative of the school for purposes of identifying a suspected handicapping condition, LEA personnel provide the parent the reasons for assessment and the opportunity for a conference with school personnel in a language in which the parent is fluent. They must obtain written permission from the parent to conduct the assessment, and then forward the referral to the director of special education. As will be discussed, parents and schools are both afforded opportunities for appeal relative to the need for evaluation.

---

[1] Although the state does not mandate public education beyond the 5-18 age range, ECEA calls for child-find endeavors and non-public school services for the 0-21 handicapped population.

State regulations call for an evaluation of a student with a suspected handicapping condition upon referral to the administrative unit's director of special educaton. The LEA special education teacher and the NSSA staff (director, psychologist, and speech threapist) then conduct the evaluation. The state requires the examiners to pursue areas of concern according to the scheme shown in Table 6.

Evaluation instruments are selected to minimize any type of cultural or ethnic bias. Instrument selection and adaptation are up to the discretion and professional judgment of the psychologist and speech therapist. Much of this is arrived at through "leg work" on the part of NSSA staff and local teachers. Informal contact with parents is the rule rather than the exception. The psychologists and speech therapists attempt to get a feel for the student's background and home environment. Staff participating in the evaluation also "know" the student, his/her background, culture, linguistic traits, and coping mechanisms. Without this knowledge, evaluations could not be conducted without a large degree of examiner bias.

If the evaluation determines that a handicapping condition does not exist, the staffing process does not continue. In such cases, other options are explored--such as Title I services. Here, the advantages of a small school surface. The flexibility in a given building and the nature of staff relations often allow a student who needs help but does not qualify for special education to receive some form of local services. The special education director operationalizes his goal of "what's best for the student and what's best for the staff" by attending most staffings and, in a sense, negotiating with superintendents concerning how best to meet the student's needs. As such, NSSA cooperative strategies are paramount to this process.

If the evaluation does determine the existence of a handicapping condition, the staffing continues. However, the regulations require a 30-day limit in time between referral and staffing (to be discussed next). Meeting this limit is difficult in the NSSA area. There are several reasons for this. Because of the limited state reimbursements, only so much transportation can be budgeted. Each of the two pairs of psychologists and speech therapists must travel together in the NSSA's car in order for the agency to be reimbursed for staff transportation costs. Thus, they visit their assigned LEAs about one day a week, or four days a month. This results in a typical four-school-week lag between referral and staffing--yet just barely within the 30-day requirement.

This four-week lag, especially at the beginning or end of the school year, is one of the few complaints local staffers consistently voice. The root of the problem relates to the spreading of all available reosurces (NSSA support service staff) across the LEAs. Again, the special education director smoothes any rough edges; yet he cannot

Table 6

State Requirements for Addressing Evaluative Areas of Concern

	Suspected Handicapping Condition							
Area of Concern	Physical Impairment	Vision	Hearing	Limited Intellectual Capacity	Emotional/Behavioral	Perceptual/Communicative	Speech	Multiple[1]
Vision/Hearing	M	M	M	M	M	M	M	
Educational Assessment	M	M	M	M	M	M	0	
Developmental History	M	R	R	M	M	M	R	
Adaptive Behavior	R	R	R	M	M	M	R	
Health History & Current Health Status	M	R	R	R	R	R	0	
Vision Assessment	0	M	R	0	0	0	0	
Hearing Assessment	0	R	M	0	0	0	0	
Speech and Language Assessment	0	0	M	R	0	M	M	
Psychological Assessment	R	R	R	M	M	R	0	
Other Agency Information	0	0	R	R	R	0	0	

[1] For a child with multiple suspected handicaps, the assessment procedures shall be those indicated for each of the individual suspected handicapping conditions.

M - Mandatory
R - Recommended
0 - Optional

provide more staff. The time between referral and staffing, however, does conform to state guidelines. LEAs, aware of this and respectful of the director, live with, but understandably balk at, the delay in determining placements for referred students.

Placement and the Development of the IEP

The identification of a child's educational needs, the determination that the child is handicapped, and the identification of characteristics of services required to meet the handicapped child's needs is made by the staffing committee. The composition of the committee includes the special education director, or his designee, an LEA administrator or his/her designee, a classroom teacher or counselor, a special educator, and a school psychologist, parents, and any other person with significant knowledge about the child.

Usually, the first four are always represented, as is the school psychologist. Other personnel are gathered as needed by the special education director. Although parents are now required to be committee members, the NSSA's stipulation of a "waiver" (to be discussed in the next section) used to allow a staffing to be held with or without the parent(s).

Where the assessment indicates that consideration should be given to recommending placement of a child in a community center program, the staffing committee is required to include representatives of such agency. Parental permission for participation of such representatives is also required. In no case may any member of a staffing committee function simultaneously as the designee of more than one other member of the committee.

Specialized personnel such as vision and hearing specialists or related service personnel such as occupational and physical therapists are required to be involved if the evaluation indicates the possible need for these services. However, these personnel must be hired by the director as part-time consultants. Often, the director depends upon the state's universities as sources of these personnel.

Specific functions of the committee include: (a) certifying that an assessment of sufficient scope and intensity was completed; (b) interpreting the results of these evaluations; (c) determining whether the child is unable to receive reasonable benefit from regular education; (d) determining whether the identified needs exist because of a handicapping condition; (e) establishing goals and instructional objectives to meet the identified needs; (f) identifying the characteristics of instructional and/or related services which will meet the child's educational needs; and (g) recommending to the director of special education the types of persons which might most appropriately deliver the services and types of classes in which services might most appropriately be delivered, i.e., placement.

The execution of these staffing functions results in the Total Service Plan, i.e., present levels of functioning (a and b above), goals (e above), and placement (c, d, f, g). Ostensibly, a student could receive a set of educational goals and remain in his regular classroom placement. The nuts and bolts of the IEP, the objectives, procedures, evaluative plan, and materials (the Individual Implementation Plan, IIP) are developed by the special education teacher with the help of LEA and NSSA personnel. It is the special education teacher who involves the parents in the IEP process--she/he also handles the brunt of the paperwork duties.

Parents are involved to the extent that they and the schools are willing to facilitate that involvement. It is often the personal relationships among teachers, administrators, and the parents, as well as continuous communication between teachers and parents, that facilitate this involvement. The NSSA Special Education Director sets the stage for these informal modes of implementation. He believes that if there is a potential problem, one works with parents in a preventative fashion, not reactively, but proactively. He often makes home visits himself rather than delegating those responsibilities to someone else. He attempts to maintain channels of communication, believing that on-going, caring interactions typically satisfy the needs of all parties and avoid the necessity for due process hearings.

Regarding record-keeping, teachers and administrators both maintain typically heavy paperwork duties. The NSSA (and the state), for reimbursement purposes, require the following data: (a) number of children screened, referred and assessed, (b) measurement of IEP objectives completed through use of pre-post testing with standardized and informal tests, (c) number of children currently enrolled in programs, and (d) return rates to regular classrooms where appropriate.

Review of the IEP

A review of needs and progress of each special education student enrolled in a public school, a community centered program, or an institutional program is made at least annually, or more frequently, when information suggests a program change.

Procedures. The adequacy of an IEP or the need for program change is determined by an appropriate review committee usually consisting of the original staffing committee. If a child has been placed in a Community Center Board program, the review committee will include representatives of that program. If the child has been placed in an institutional or private agency, arrangements will be made for consultation between that agency staff and the administrative unit. If a change of placement or termination of services is being considered, the committee will be of the same professional composition as the original staffing committee.

Re-assessment For Eligibility. A child who has been determined to be handicapped and in need of special education and/or related services will continue to participate in such a program as long as educational needs are determined to be best met by such a program.

A re-evaluation of each student placed in a special education program in public school, a community centered program, a district recommended private setting, or an institutional program, are made at least every three years, or more frequently when information suggests. The procedures for referral and assessment are followed when re-assessment is suggested.

Procedural Safeguards

The due process procedures of the NSSA conform to all relevant federal and state statutes and regulations. In order to insure that parents have an appropriate opportunity to influence the educational decision making process, LEAs must provide prior notice to parents and establish an appropriate appeals process. In order to insure that parents have an appropriate opportunity to influence the educational decision making process, the following safeguards for parents are maintained by the NSSA.

Prior notice. Prior notification consists of a written notice, mailed or hand delivered, to the parents of a handicapped child. Such a notice includes: (a) a full explanation of the procedural safeguards; (b) a description of the action proposed or refused by the agency, an explanation of why such action is proposed and a description of other options considered and why they were rejected; and (c) a description of the data which prompted the agency to propose this action.

Written parental consent is defined as, "The parent's understanding and agreeing, in writing, to the proposed service." The parents must be informed that consent is voluntary and may be revoked at any time. This consent is required before any evaluation or staffing can be conducted.

Parent participation in the pre-assessment and staffing meetings is described as "limited" in some districts and "good" in others. Administrators report a range of 50 to 90 percent attendance at meetings across the districts. Most agree that at the secondary level, fewer parents involve themselves in the process.

The NSSA, with the approval of state, at one time used a "waiver" procedure. Here, parents could waive their rights to be present at staffings. Until the NSSA began to use this procedure in 1980, potential services for students who might not receive an otherwise appropriate education could not be arranged. The waiver option enabled the committee to continue through the identification and placement processes if and when parents were not able to be involved. The NSSA dropped the option in 1981 electing instead to attempt to involve the parents, even if it means continuous home visits.

Appeal and Hearing. Should either the parents or the district seek impartial resolution of a staffing-related disagreement, they can request and receive an appeal conference or request an impartial hearing.

Appeals are mediated by the director of special education. Should the parents continue to disagree with the decision of the director of special education, or his designee, they must notify the superintendent of the school district in writing, and give the reason for disagreement. The superintendent then must see to it that the child's placement is investigated, including additional evaluation and conducting a conference with parents and/or appropriate school personnel, to attempt to resolve all remaining differences regarding the child's placement, and set the hearing. The decision of the superintendent, or his designee, must be made within ten school days after receipt of the appeal.

If the parents wish to appeal the decision of the superintendent or his designee, regarding the placement, such a request is submitted, in writing, within ten school days of such decision. Within ten school days after receipt of the request, a date shall be set for a hearing. Such date shall be not more than 20 school days after receipt of such request. The parents or their respective representatives, shall be given written notice at least ten school days prior to the date of the hearing: (a) of the time and place of the hearing; (b) that they may bring legal counsel and cross-examine witnesses at no expense to the district; (c) the district, at the parent's request, shall assure that appropriate school personnel be present when the hearing is held during the day; (d) that they may review and request copies, at their own expense, of all school records concerning the subject child at any time prior to the hearing; and (e) that a written or electronic verbatim account of the hearing shall be kept.

The hearing must be conducted by an impartial hearing officer. The hearing officer must not be: (a) a person who is an employee of the district which is involved in the education or care of the child; (b) a person having a personal or professional interest which would conflict with his or her objectivity in the hearing; (c) a person who otherwise qualifies under paragraph (a) or (b) of this section is not an employee of the agency solely because he or she is paid by the agency to serve as a hearing officer.

Within 20 school days after the conclusion of the hearing, the hearing officer renders, in writing, his findings of facts and decisions concerning the appeal and forward this to the chief executive officer of the district of the child's residence. A written copy of the findings shall be mailed or personally delivered to the parents.

Again, the director's approach of nipping problems in the bud avoids the lengths of these due process stipulations. By "letting parents know he wants to work out problems," the director has avoided three appeals and due process hearings during his seven year tenure at the NSSA. The state also helps by encouraging a statewide parent group, "Parents Educating Parents." The NSSA chapter has seen better days regarding parent participation in the group. However, the group is intended as supportive not adversarial with respect to the public schools.

ISSUES OF PARTICULAR CONCERN TO THE NSSA

As the reader will have surmised from the preceding pages, the NSSA is not devoid of problems. No doubt the major dimensions of these difficulties are already apparent. Nevertheless, for ease of reference and for the sake of clarity, they will be briefly described again in this section. The order in which they appear is not necessarily reflective of their importance or priority to the people of the Northern Slope (indeed, it is doubtful if a single priority listing could be found on which even a majority of stakeholders would agree). They have been arranged in terms of the project staff's subjective judgment about the extent to which the problems are exacerbated by the fact that the Northern Slope is a rural setting. Thus the first problems are likely to be found anywhere in substantially the same form as in the Northern Slope area, but as we move down the list, the influence of its rural status is likely to become more and more telling.

Education: Right or Privilege?

The matter of equity in the availability of educational services is a nationwide concern. This concern has received considerable attention in this state where the Supreme Court (at this writing) was deciding the constitutionality of the state's Equalization Aid mechanism. The issue is whether or not this mechanism treats land- and income-poor districts equitably. When these districts are sparcely populated and inhabited by minority cultures, the costs of educational services are compounded geometrically. Isolated, high-poverty districts, even when cooperating via a service agency, are still unable to provide curricula, programming, and specialized services (including special education) at a level equitably comparable to those provided by wealthier districts with larger student populations.

The State Supreme Court must decide whether such conditions impinge on "the right" to a public education. Appellants (the State Board of Education and 26 school districts) contend that "education is not a fundamental right" but a privilege. Appellees (all school children in 16 of the districts), and indeed the lower courts, contend that it is a fundamental right. They further maintain that . . . "students in low-wealth, low-spending districts receive an educational opportunity significantly below that offered to students in high-wealth, high-spending districts."

An equitable equalization mechanism would increase the expenditures of poorer districts allowing them to provide more in the way of material resources and improve . . . "teacher quality, especially the teacher's verbal ability to communicate the operative principles of a course of study and their interrelationships."

As such, the state is perceived by some as having a system, albeit with questionable equity, for aiding local schools on the one hand and a long tradition in statutes and practice of allowing for local control and discretion in decision-making on the other. The final decision is resting with the Supreme Court. If it rules in favor of the appellants, it is in effect denying education as a fundamental right. Not the least of those who are to be affected, one way or the other, are the handicapped who have the right to a free, appropriate, public education as defined by P.L. 94-142.

Attitudes Toward the Handicapped

It is often said that "the more things change, the more they remain the same." The state recently changed the categorical labels related to the traditional special education categories of mental retardation (SLIC), behavior disorders (SIEBD), and learning disabilities (P-C). Presumably, the goals behind these changes were to increase the precision with which these students are identified and to guard against inappropriate labeling of minority students as handicapped, especially mentally retarded students. Upon visiting the LEAs in this area, one notes that a high percentage of mildly handicapped students are classified as P-C and placed in local resource rooms. There appears to be a tendency to use "sensible" caution in applying the SLIC label.

At least some of the reasons for this tendency are clear. Caution in labeling is prudent when one considers the possibility that a "SLIC" child with an IQ of 67 may not be a "SLIC" child nine months later. It is difficult to differentiate mildly handicapped and under-achieving students. Instruments are less than adequate. It is the feeling of a few that special education programs are used as "crutches" for at least a few students. These are children who are not working up to capacity--for them the IEP and its process are "smokescreens." The feeling is that life in the real world does not come with a crutch.

In effect, behavior and/or appearance must cross a line of demarcation in the eyes of some before the label can be affixed. The labels "physically disabled," "emotionally disturbed," "mentally retarded," are seen as bona fide handicaps, afflicting unusual children. The line of demarcation is a relative, not absolute, boundary. Locals tend to place the line in a position that represents the extent of their knowledge and experience with deviance. Thus, the most locally unusual disability becomes the most severe disability.

Collaboration and Local Control

A major problem with which the Director and staff of NSSA are continually plagued is the achievement of an appropriate balance between local and agency interests. The need to maintain local autonomy, often cited in this report, is sometimes found to be in opposition to agency requirements for the implementation and maintenance of a well-balanced program consistent with the intent of P.L. 94-142.

LEA members of the NSSA retain the right to withdraw from previously contracted services, or to decline to participate in services which the service agency has decided to make available. Withdrawal from a program results in a reduction in LEA-contributed funds; less money is available to maintain salaries, supplies, equipment, and the host of other fiscal commitments which programs entail. But the need for service provision does not diminish correspondingly. If six LEAs have been involved in (and have been billed for) a certain service, and one withdraws, the withdrawing LEA retains the privilege of stopping payments, although it cannot withdraw during the current budget year. But the NSSA is committed to providing the program for the remaining five. Further, the NSSA is not in a position to demand increased payments from the remaining LEAs. Available resources are thus spread more thinly; not surprisingly, it is inevitable that a reduction in program quality results.

Thus, while the NSSA is officially accountable for the provision of adequate services under P.L. 94-142, and is monitored by the SEA to be certain that adequate services are provided, the NSSA is not itself ultimately in control of the decisions that determine program quality. It can only encourage LEAs to provide that quality.

An example of this situation is found in the elimination of the position of learning specialist. Clearly this specialist could have provided valuable consultative services to LEAs, but the position was dropped because of several withdrawals of LEAs from commitments made the previous year. The services that would have been provided were simply reassigned to others, but they, having already a full load of expectations, were unable to respond to them very well.

NSSA staff are inevitably in a conflict situation so long as local autonomy needs retain priority over centralized program needs. The NSSA finds itself in the position of having to finesse the implementation of its own ideals about how to serve handicapped children, while at the same time being held accountable by the SEA for deviating from those ideals.

Clearly, closer collaborative modes are needed between the NSSA and its member LEAs. An appropriate reconciliation of interests requires the establishment of an honorable balance between "what is" and "what is right." Given the lack of authority to affect local practices, the NSSA staff can hope to influence those practices only through negotiation--and by over-extending themselves. They do both admirably. They have no power other than the power of persuasion--a power which in turn depends on the quality of relationships between LEA and agency administrators. Whatever collaboration is achieved currently is achieved only because of the highly personalized style of incumbent administrators.

The Pervasive Impact of Interpersonal Skills

It is clear that interpersonal skills are essential to collaborative efforts; the impact of these communicative skills on meeting the intent of P.L. 94-142 is pervasive.

Personality factors filter through all levels of service provision. We have stressed how well the NSSA Director and special education director work with superintendents and principals. We also have discussed the psychologists and speech therapists, their itinerant functions, and the importance of their interpersonal skills. The grass roots, building level also has its interpersonal demands; and we've looked at the effectiveness of the area's resource teachers in this regard. We've even seen that a service provision role, e.g., the learning specialist, can even be eliminated, at least in part, because of personality variables.

There is a common theme across all service levels with regard to personality. When a position is newly filled, the incumbent invariably finds that his or her predecessor's style results in legacies with which he or she will have to contend. One either fulfills the legacy of someone who was viewed positively, or overcomes the legacy of someone who was viewed negatively.

The legacies with which current NSSA and local staffers have contended have tended to be of the latter pattern. In each of the cases, it was the staff member's personality coupled with his/her work ethic that turned the tide of opinion on the part of significant others.

The current NSSA Director is the second in the past ten years. In a sense, he has had to overcome a legacy relative to the expectations of the local superintendents. His predecessor was apparently very political in terms of his use of the NSSA board process. Evidently, he'd created a negative atmosphere among superintendents--one in which their differences rather than common interests were accentuated. Upon replacing this person, the current director identified this tendency and operated the NSSA in a fashion that accentuated common interests and cooperation. He used the state's permissive system in a beneficial, rather than adversarial way.

The current South Side psychologist followed an individual who "damaged the NSSA's image" in at least one of the districts. This damage, according to local personnel, was the result of personality clashes. The current psychologist has won rapport with his LEA colleagues and can apply personal styles and philosophy with a higher likelihood of success with respect to the needs of handicapped students.

We have two examples of legacy in regard to the role of special education teacher--one of overcoming, the other of fulfilling. One regular classroom teacher told us of a former special education teacher who was a "hustling type of individual" (work ethic). That teacher was replaced by one whose training and experience were inadequate for this role. He didn't know how to hustle; he couldn't live up to his predecessor's standard. The current special education teacher in another district is quite well received by the regular teachers. He's proactive in initiating and maintaining programmatic communication with teachers. Again, he accentuated a function his predecessor failed to perform: interpersonal communication.

In all cases, personality facilitates cooperation. From the perspective of the pervasive dependency of quality programming on interagency collaboration, these cooperative, proactive, hard-working personality traits loom important in overall NSSA effectiveness.

Parent Participation

In this state, we find regulatory assurances of parental contact concerning the IEP process, and we find procedural safeguards of the rights of handicapped children and their parents. The law now requires parents to be members of IEP staffing committees and has always required their written permission for psychological evaluations and special education placement.

Not surprisingly, there is substantial variability in parent participation. Estimates of local officials in three of the LEAs ranged from 10 to 60 percent in regard to the proportion of parents who typically waive their rights to attend IEP staffings. Officials in some districts perceive most parents who attend as being "over their heads," taking a passive role in the IEP process; although in others, those who do attend offer cogent suggestions and ask pertinent questions concerning evaluation and programming.

At least two consistencies regarding parent participation have emerged, however. First, regardless of the variability across districts in the use of waivers, the majority of parents who are involved in the process are parents of elementary-aged students. Most LEA staffers indicated that few, if any, parents of secondary students attended the staffings. This is a fairly common pattern, believed to be due, in part, to less optimism on the part of parents of older students. In addition, as one parent indicated, older parents tend to be less aware than younger parents.

The second consistency relates to the style of the professionals working with the parents. Their manner of interaction is the keystone to making parents feel comfortable about their input, and their understanding of input from others. One principal indicated that he often asks teachers, "What do you mean by that?" in an effort to keep terminology simple and to the point. In addition, the special education director's style in interacting with parents is similarly accommodating. When talking with parents about any problems concerning their children's services, the director "lets them know I want to work something out." When the word spreads as it so often can regarding a parents' possible dissatisfaction with their child's services, the director contacts the parents, rather than waiting for the parents to contact him. Taking the initiative and sharing the responsibility for problem solving are hallmarks of a competent, professional interaction style that can only facilitate parental involvement. While the NSSA (and the world) await a comprehensive strategy for addressing various patterns of parent involvement, we can be assured that a proactive, consonance-oriented professional style would be a step forward toward that strategy.

Recruitment and Retention of Staff

Recruitment and retention are often mentioned in the same breath, implying one issue. Actually, they are two separate issues in most rural school contexts. The NSSA is no exception. While the NSSA and LEAs encounter some difficulty recruiting personnel, a more troublesome problem is keeping qualified personnel on board.

Parts of the area attract young, single people who see the location as a respite or escape from city life. Thus, teachers attracted to the area often have little, if any, experience. Salaries tend not to be competitive, and the state salary ranking structure typically credits teachers with fewer years of experience than they've actually had.

Some of those who do come aboard in spite of noncompetitive salaries find working and living conditions less than satisfactory and leave. As in most areas with a predisposition for teacher turnover, a variety of related factors obtain. It is "tough" for a single person to cultivate peer relationships due to sparsity. New or inexperienced teachers are especially vulnerable to small well-entrenched school staffs. Interactions with "veteran" general education teachers occasionally can go awry. Their "single" status and inexperience make job happiness dependent, in large part, on the aforementioned interpersonal skills; skills they must learn to demonstrate quickly.

Compounding the above factors is the itinerancy role. Newly hired personnel who function as itinerants must resolve potential "multi-boss" conflicts. The travel demands of itinerancy consist not only of inordinate windshield time but also of sometimes drastic but necessary changes in professional style from district to district, building to building, boss to boss. They also must contend with the fact that overextended caseloads keep them from making strides in the race between decelerating idealism and acute reality. The reality is that, although itinerant support personnel are overextended, not everyone who needs help is going to get it.

One principal has a set of informal coping guidelines he's compiled after watching both itinerant and building-based staff members come and go:

Rule 1. Don't compare the building you're in now with others you serve. Human nature dictates that we all tend to compare ourselves to others. This is all right as long as someone else doesn't do the comparing for us. The same is true for organizations. Personnel in a building cringe at comparisons an "outsider" might make between their own policies, procedures, or weaknesses and those such a person might have observed in another building, regardless of how constructive the person may have intended the comparisons to be.

Rule 2. Defend your position or bailiwick without alienating colleagues. This is quite difficult for new teachers. Idealism and reality are at opposite ends of the continuum. Small schools tend to be slow to change. New ideas about ways and means of solving problems can fall on deaf ears as a function solely of the source of such suggested innovations.

Rule 3. Identify the pecking order. Each building will have formal and informal leadership patterns. A new teacher must be aware of these patterns. Who can you talk to? Who should you avoid? Who plays both ends against the middle?

It would appear that the finger of responsibility relative to these coping skills points directly at teacher-training programs. It is becoming increasingly clear that a well-prepared teacher should have facility in such skills as well as demonstrating instructional competence. Those lacking in either tend to be those who do not last long.

Boundaries: Natural and Otherwise

Finally, we address an issue that may be unresolvable: the topography. It is not hard to conjure an image of this area: mountainous, stark beauty, winding roads. Many organizational decisions, e.g., grouping the North and South Side LEAs, are made on the basis of topography. The large mountain ranges and remote locales of many of the area's towns result in pockets of isolated people--some of whom do not even have access to a current daily newspaper.

The mountains also separate the area from the state capitol. The lifeline to state education department staffers who provide direction and consultation regarding policies and procedures can be either the telephone or the airplane, but these officials are far away nonetheless.

They're far away geographically, and they view a different world. Thus, the state's approach is reliance on local discretion regarding policy implementation. The NSSA is about as isolated from state assistance as is possible. Although this is advantageous from an autonomous point of view, the welfare of handicapped students rests in the laps of local leadership personnel. With respect to the NSSA, these personnel are top notch. Their collective leadership quality is without reproach. One can only wonder, however, what effect less competent leadership in this context would have on handicapped students and their families, not only here, but in similar settings as well.

WHAT CAN BE LEARNED FROM THE CASE?

The preceding pages should have given the reader a "feel" for what it is like to live in the Northern Slope area; they should have provided a vicarious experience as seen through the eyes of the local participants. If we have been successful in providing such a "thick description," the reader by now will feel quite familiar with the NSSA, its circumstances, and its issues.

And thus the question: "So what?" What can one make of all this? Is there anything to be learned? There are of course many lessons--although the reader should be careful not to assume that these lessons are generalizable to other such agencies indiscriminately. Indeed, a further reason for providing so much thick description is to make it possible to reach a judgment about the degree of similarity between the NSSA and any other site to which a reader might wish to transfer the findings. If there is a high degree of similarity, transfer might be appropriate--but even then careful selectivity will characterize those transfers.

No doubt the reader will already have drawn many lessons for himself or herself, depending on particular interests or concerns. The purpose of this section is not to point to all possible lessons but to focus on a few that seem to be of special importance. The particular selection is of course a subjective matter, but it has not been made haphazardly. Instead its seeks to emphasize those matters that seem particularly salient at the site itself, or that are of special national interest at this particular time.

We began by describing the area: its demography, its schools and its Northern Slope Service Agency. We have discussed its boundaries--artificial and natural. We've learned about the ways the sparcity of the Northern Slope area affects the governance of the agency. And we have noted that the state has built in a hefty component of local discretion into the NSSA and all service agencies, in part because of the natural boundaries and sparsity that are characteristic of most regions of the state.

Thus, the state is more permissive than most regarding its role in the governance and maintenance of service agencies. Yet its regulations for the education of exceptional children are mandatory. Service agencies, created with local autonomy as their cornerstone, are accountable for the implementation of these regulations should they qualify as administrative units, as many do, including the NSSA.

In effect, the state requires compliance with regulations without providing sufficient assistance to the agencies responsible for that compliance. Nor are the incentives present since actual state special education reinbursement funds are significantly less than the levels authorized by law. From these circumstances we learn:

LESSON 1: WHEN THE REQUIREMENT FOR AN EQUITABLE STANDARD IS NOT COMPLEMENTED WITH ASSISTANCE AND INCENTIVES FOR REACHING THAT STANDARD, LOCAL IMPLEMENTORS MUST CROSS THE GULF BETWEEN WHAT IS AND WHAT SHOULD BE AT ITS WIDEST STRETCH.

As with any comparable voyage, a good captain and crew are paramount to reaching the destination. Appropriate services to handicappped students is our destination. Getting there requires astute leadership and style. The NSSA is blessed with the leadership capabilities necessary to facilitate appropriate services for handicapped students in the face of a permissive organizational context and a sparce, somewhat isolated natural context. One ponders about how other service agencies that lack in the kind of leadership found in the NSSA provide for their handicapped students. Along these lines we offer:

> LESSON 2: WHEN RESPONSIBILITY WITHOUT CLOUT CHARACTERIZES A COOPERATIVE AGENCY, ONE USES THE LEADERSHIP STYLE OF THE DIRECTOR AS THE BAROMETER OF THE AGENCY'S EFFECTIVENESS IN PROVIDING COOPERATIVE SERVICES.

One may well ask what are the components of "leadership style?" A precise delineation is not possible; yet throughout the case, we have provided portraits of several staff members in leadership positions.

Several common characteristics of these staff members have emerged. They're proactive. They meet problems square in the face rather than hoping that the problems will "go away." They're personable. The special education director is a native of the area. He's more than an administrator, he's a citizen, a member of the community. People can depend on him.

Perhaps most enlightening is the common characteristic of problem-solving. Although informal, negotiation is the key strategy. Working out problems, conflicts, and even disputes, the NSSA Director and the NSSA Special Education Director avoid radical postures. What's good for the student and what's good for the district--these are the key balances implicit in their leadership styles.

We do not ignore the complexities involved in teaching leadership personnel these skills. Whereas difficult to teach, they are convincingly germane to the quality of agencies like the NSSA. And so, we learn:

> LESSON 3: INSTITUTIONS OF HIGHER EDUCATION MUST RESPOND TO THE TRAINING NEEDS OF SPECIAL EDUCATION ADMINISTRATORS AS WELL AS SPECIAL EDUCATION TEACHERS.

Is it even possible to "teach" these skills? After all, the underpinnings of the leadership skills portrayed in this case seem almost unteachable; caring, ethical, competent are descriptors of the people in charge. Can we make people caring or ethical? Indeed, are we even able to make them competent? These are crucial questions, ponderable but not necessarily answerable.

Thus, from the perspective of the training institution, it is difficult enough to facilitate competence in leadership personnel. How can caring or ethics be taught? Some university faculty have been known not to demonstrate those traits themselves. Furthermore, rifts seen at the district- or building-level between administrators and teachers or between regular and special education similarly are reflected in relationships among the faculties of training institutions. When cooperative skills are not learned, it is somewhat difficult for a cooperative agency of any kind to operate. Thus, as simplistic as it sounds, we learn:

LESSON 4: COOPERATIVE AGENCIES ARE FUELED BY THOSE WHO HAVE LEARNED THE ART OF COOPERATION AND STYMIED BY THOSE WHO HAVE NOT.

Perhaps, then, the ultimate question is do we care enough about those we serve to cooperate in the provision of those services? Do we care about handicapped students enough to adapt to the discrepancy between what should be and what is, between policy as it is intended and policy as it is implemented? If we don't, it is not likely that we will care enough to cooperate in their best interests.

But for those of us who do care, a final lesson:

LESSON 5: COOPERATIVE AGENCIES IN ALL SHAPES AND SIZES ARE PEOPLE-ORIENTED REGARDLESS OF THEIR ORGANIZATIONAL MAKE UP. IF ACTUAL SPECIAL EDUCATION PRACTICES ARE EVER TO MATCH INTENDED POLICIES, WE MUST RESPOND TO THE NEEDS OF SERVICE PROVIDERS IN THE SAME INDIVIDUALIZED FASHION AS THEY MUST RESPOND TO THE NEEDS OF HANDICAPPED STUDENTS.

INTERORGANIZATIONAL SPECIAL EDUCATION PROGRAMMING IN RURAL AREAS: TECHNICAL REPORT ON THE MULTISITE NATURALISTIC FIELD STUDY

Thomas M. Skrtic

Egon G. Guba

H. Earle Knowlton

VOLUME IV

Research Contract No. 400-81-0017 from
the National Institute of Education to the
Department of Special Education
University of Kansas, Lawrence, Kansas 66045

© 1985

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

This report is made pursuant to Contract 400-81-0017. The amount charged to the Department of Education for the work resulting in this report (inclusive of the amount so charged for any prior reports submitted under this contract) is $194,922.77. The names of the person, employed or retained by the Contractor, with managerial or professional responsibilities for such work, or for the content of the report, are as follows: Thomas Skrtic, Earle Knowlton, Egon Guba, Neil Salkind, Edward Meyen, Kathleen Bolland, Stephen Foster, Lynda Schoonmaker.

The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that agency.

TABLE OF CONTENTS

VOLUME I
PART Page

I Introduction 1
    The Problem 1
    The Field Study Research Questions 2
    Overview 4

II Methods 6
    The Emergent Paradigm of Thought and Belief 6
    The Paradigm of Naturalistic Inquiry 10
    Implications for the Doing of Inquiry 14

III Procedures 20
    The Design Update 20
    Site Selection 21
    Procedures for First Visit to Each Site 24
        Initiating Contact and Gaining Entre 24
        Sampling Respondents 25
        Consent Forms 25
        Logistics 26
        Interviewing 27
        Document Collection 30
        Journal Entries 30
        Other Activities 31
        On-Site Team Interactions 32
        Debriefing 33
    Analyzing Site Visit 1 Data 34
        Unitizing 34
        Individual Categorizing 35
        Team Categorizing 37
    Procedures for Second Visit to Each Site 38
    Analyzing Site Visit 2 Data 40
    Drafting the Case Study 40
        Indexing the Materials 40
        Generating an Overall Outline 41
        Cross-Referencing Materials to the Outline 43
        Conventions Governing the Writing 44
        Integrating Themes Drawn from the Research Synthesis 46
        Developing Questions for Site Visit 3 48
        Abstracting Problems/Issues and Generating Lessons to be Learned 48
    Internal Review and Revision of the Case Study 49
    Procedures for Third Visit to Each Site 50
        Selecting the Review Committee 50
        Delivery of Pre-Visit Packet 51
        The All-Day Review Meeting 52
        Interviews with Special Respondents 53
        Debriefing 54

Final Revision of the Case Study 54
Trustworthiness 55
Counterpart Criteria 55
Operational Techniques for Meeting the Trustworthiness Criteria 57
The Present Study and Trustworthiness 59
Notes on Methodological Issues 62
Some Practical Issues 62
Contract/Paradigm Disjunctions 62
Design Problems 64
Problems in the Field 67
Problems in Writing the Case Study 69
Problems with the Member-Check (Review Committee) Process 73
Some Theoretical Issues 75
The Feasibility and Utility of Trustworthiness Measures 75
Fitting the Naturalistic Paradigm: Was the Right Model Selected to Guide the Inquiry? 78

IV Results 81
Introduction 81
Organizational/Governance Issues 81
Service and Delivery Mechanism Issues 94
Instructional Programs 94
Non-Instructional Services 95
Some Observations 96
Child Find 97
The Staffing (IEP) Process 98
Facilities 102
Private and Parochial Schools 104
Recruitment and Retention 106
Organizing for Service Provision 107
Training 110
Administrative Relationships 112
Parental Involvement 113
Involvement in the IEP/Staffing Process 114
Due Process 115
Effectiveness and Impact Issues 117

V Generality of Findings 134

VI Conclusions and Policy Recommendations 136
Caveats 136
Needs 139
Trade-Offs 141

References 147
Appendix A: Auditor's Report 149
Appendix B: Tables of Interviewees 164

VOLUME II
APPENDIX

C Site #1 Case Study 1-88

D Site #2 Case Study 1-124

VOLUME III
APPENDIX

E Site #3 Case Study 1-66

F Site #4 Case Study 1-134

G Site #5 Case Study 1-43

VOLUME IV
APPENDIX

H Commissioned Papers . . . .

- Special Education in Rural America, Paul A. Worth 1-53
- Dean's Grants Projects and Rural Education, Maynard C. Reynolds 1-50
- Local Implementation of P.L. 94-142: Similarities and Differences Between Rural and Nonrural Local Education Agencies (LEAs), Anne R. Wright 1-19
- Problems and Strategies Regarding Regionalizing Service Delivery: Educational Collaboratives in Rural America, Doris Helge 1-47

702

Appendix H

Commissioned Papers

Commissioned Papers

These four papers were prepared at various points during and after the contract period. Each paper, in its own way, added to our overall understanding of rural special education and the role of educational service agencies in the implementation of P.L. 94-142. We are grateful to the authors for their hard work and their willingness to share their ideas with us. As the reader will see, each paper addresses a particular problem associated with implementation in rural areas and contributes to a broader understanding of a complex set of issues.

T.M.S.

E.G.G.

H.E.K.

SPECIAL EDUCATION IN RURAL AMERICA

Paul A. Worth
ERIC/CRESS

Prepared for

Special Education in Rural America,
a project supported by Research Contract
No. 400-81-0017 from the National
Institute of Education to the Department
of Special Education, The University of
Kansas.

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

Written March 1982

SPECIAL EDUCATION IN RURAL AMERICA

Rural Education in America Today

Rural Definitions

The answer to the question what is rural is deceptively difficult. Rural America is too pluralistic to be described in simplistic terms (Edington, 1976, 1980; Helge, 1979; Sher, 1977; Sher & Rosenfeld, 1977). The diversity of rural America often exists between rather than within communities (Sher & Rosenfeld, 1977). In general, the term rural connotes small communities and low population density. Rural, though, is a relative term which is frequently interpreted differently by various data collection agencies depending on the type of information sought and the purpose of the investigation (Helge, 1980).

Population-based and density-based definitions of rural have been proposed, but all suffer from some degree of arbitrariness (Sher & Rosenfeld, 1977). The two most common sets of terms utilized are rural vs. urban (places having a population of 2,500 or more) and nonmetropolitan vs. metropolitan (places within standard metropolitan statistical areas); but regardless of descriptors employed, some misclassification is unavoidable. Moe and Tamblyn (1974) feel definitions of rural and urban and farm and nonfarm have largely lost their meanings except for purposes of decennial comparisons. Dawson (1954) suggested that regardless of definitions there are two clearly identifiable characteristics of rural America:

> The first is relatively low density of population. Rural people live in smaller groups and farther apart than city people. The second characteristic is that rural people are primarily engaged in farming, or extracting natural resources, or in processing resources of the immediate surroundings, or in performing services for people so engaged. This concept includes open country, farm villages and communities or people engaged in mining, lumbering, fishing, and related processing activities, and also the people engaged in personal, professional, and business services in such communities (p. 9).

To further confuse the situation, the terms small, country, rural and non-metropolitan are commonly used interchangeably and have been interpreted differently at various points in history.

Perhaps the critical point is that the rural population is not insignificant (Edington, 1980; Sher, 1977). Depending on the definition adopted, the rural population in America ranges from 18.5% to 32% of the entire population (Sher & Rosenfeld, 1977). In addition, Calvin Beale (1978) has noted a significant resurgence in rural populations, reversing the out migration trend so prevalent after World War II.

Likewise there has been confusion and lack of clarity concerning the meaning of rural schools and rural school districts. McClurkin (1970) questioned the existence of any suitable definition for rural schools. Generally rural schools are viewed as those located in rural communities and serving rural populations. In the past, the key indicator has been the one-room school house itself, but today sparsity of population, remoteness, and isolation are critical variables. Although a myriad of definitions have been used the paramount fact remains that rural students do comprise a large sector of the total public school population. More than 15 million children ages 5 through 17 were registered in rural, non-metropolitan schools (Edington, 1980). Approximately 75% (12,000) of the nation's school districts serve rural children (Nachtigal, 1980), and there are an estimated 130,000 handicapped students enrolled in rural schools (Vasa & Steckelberg, 1981).

Often the terms rural school and small school have erroneously been used interchangeably. Although small schools are frequently located in rural areas they can be found anywhere -- including the middle of a metropolis. It is extremely difficult to derive a single definition of small, partially due to the great variability in rural population density and regional perceptions. The North Central Association classifies small high schools as those with a student population of less than 300. Various researchers (Ford, 1967; Hull, 1980; Muse & Stonehocker, 1979; Veselack, 1980) have proposed other definitions. Perhaps the most common definition of a small school describes it as one which is not large enough to provide a program for the majority of its students (Edington, 1976).

Rural Schools

Today's rural schools and school districts are heterogeneous. Some of the most innovative and progressive schools as well as some of the most inadequate schools are located in rural communities. There is no "typical" rural school. However, numerous researchers (Blasi, 1980; Edington, 1973, 1976; Isenberg, 1967; McClurkin, 1970; Muse, 1977, 1980; Nachtigal, 1980; Pankratz, 1975, Sher, 1977;

Sher & Rosenfeld, 1977; Sturges, 1974) have described common characteristics that most rural schools share:

1. Positive Attributes
    - A. Community Related:
        - Spirit of community cooperation
        - Ability to maintain local control
        - Personal identification with community life
        - Close relationship between parent, community and school setting.
    - B. Staff Related:
        - Staff knows students better
        - Slower paced environment
        - More relaxed personal atmosphere
        - High regard for teachers
        - Fewer discipline problems
    - C. School/Program Related:
        - Small class enrollment
        - Greater opportunity for individual instruction
        - Students can develop and grow within their own natural environments
        - Greater opportunity to participate in extra-curricular activities
        - Flexible scheduling
        - Empathy for the learner
        - Maximum utilization of resources

Development of shared services

Readily available learning resources

2. Negative Attributes

   A. Community Related:

      Low population density

      Higher rate of poverty

      Lack of future

      Less adequate medical care

      More dependent groups

      Limited economic structure

      Physical isolation

      Lack of transportation

      Limited social activities

      Poorer quality of housing

      Resistance to change

      Rural flight

      Lower adult educational attainment level

      Lack of upward mobility

   B. Staff Related:

      Lower Salaries

      Isolation from professional resources

      Inability to recruit and retain quality personnel

      Less qualified staff

      Inconvenience of living in a small community

      Greater number of teacher preparations

      Limited inservice opportunities

C. Finance related:

Higher per student costs

Low tax base

Less community wealth

Limited budgets

Lower per pupil expenditure

Less interest/expertise in securing money

Lack of awareness of alternative cost-effective personnel roles

D. School/Program related:

Poor physical facilities

Limited appropriate educational materials, supplies, equipment

Inadequate or limited special services and vocational education services

Lower levels of educational achievement

Higher drop out rate

Limited curricular alternatives.

Traits are frequently interrelated, and the socio-cultural patterns of the community exert a strong influence upon the strengths and weaknesses of the rural school (Edington, 1976). While analyzing the above lists, several factors should be considered: (a) rural schools are commonly viewed in comparison to urban schools; (b) not all rural schools fit all the descriptors delineated; (c) positive characteristics of rural areas often hold the key to overcoming limiting traits; and (d) many of the characteristics mentioned are based on opinion and have not been substantiated by research (Edington, 1976).

Rural Students

The overall majority of the rural population is white, but all nationalities, religions and ethnic groups are included in rural America. However, a large percentage of individuals residing in rural areas is made up of the Indians of the West, Spanish Americans of the Southwest, Blacks of the Deep South, and whites of Appalachia (Muse, 1977). Although the quality of life of rural America seems to be improving, it is critical to note that rural Americans still lag behind their urban counterparts in the areas of income, housing, infant survival, literacy, nutrition, employment and access to health and other essential services and facilities (Economic Development Division Staff, 1978; Fletcher, 1980; Hassinger, 1978; Nachtigal, 1980; Sher, 1977; Tamblyn, 1973b; Tweeten, 1980). Rural Americans compromise approximately 30% of the country's total population, but about 40% of all families classified as at the poverty level or below live in rural communities (Coward, 1980; Edington, 1976; Hassinger, 1978; Kaye, 1976).

Muse (1977) summarized:

> Rural youth live in geographically isolated, less densely populated areas. Their chances of coming from a poor family are much greater than youth who live in urban areas. The rural youth is often less self motivated to succeed educationally than his/her urban counterpart (p. 14).

Studies completed in the 1940s, 1950s, and 1960s commonly reported significant differences between urban and rural youth (Edington, 1978). Evidence indicated a distinct disadvantage for those students residing in rural areas. During the 1970s considerable empirical research (Abt Associates, 1977; Clarke, 1978; Edington, Pettibone &

Heldt, 1975; Han, 1971; Henderson, 1973; Hughes & Spence, 1973; Kuvlesky, 1976; Rich, 1979; Seidel, 1970) has been conducted. Typically these investigations have concentrated on areas of socioeconomic status, expectations, aspirations, educational attainment, occupational attainment, attitudes, and self concept.

Rural youth are not characterized by homogeneity, and results from the above studies have been equivocal and at times conflicting. Generally the gap between rural and urban students seems to be dissipating. Although some dissimilarities remain in several variables, the greatest discrepancies now appear between the suburban youth on one hand and the rural and urban youth on the other.

Rural School Problems/Solutions

From a global perspective, many educators and rural advocates contend that scarcity of research in rural areas and rural education (Edington, 1976; Moe & Tamblyn, 1974; National Advisory Council on The Education of Disadvantaged Children, 1976; Sher, 1978a, 1978b; Sher & Rosenfeld, 1977), lack of national rural education policy (Cosby, 1980a, 1980b; Edington 1980; Natchtigal, 1980; Tweeten, 1980; Sher, 1978b), and unequal federal treatment of rural America in favor of urban areas (Federal Spending, 1978, Fletcher, 1980; Helge, 1980; McClurkin, 1970; National Advisory Council, 1978; Sher, 1977, 1978b; Tamblyn, 1973) are the most crucial dilemmas facing rural schools today.

Sher (1977) noted that only 5% of all research dollars, 11% of library and material funds, 13% of basic vocational aid, 13% of dropout prevention funds, and disproportionately low levels of most other federal education funds are granted to rural areas. He added:

> There is no Bureau or Division of Rural Education in the U. S. Office of Education, the National Institute of Education, or the great majority of State Education Agencies. The National Education Association devotes only one-eighth of one individual's time to rural education concerns. The National Center for Educational Statistics doesn't issue reports or compile data on the current status of rural education....Needless to say, it is difficult to correct deficiencies or foster improvements in schools systems which the education profession seems determined to ignore (Sher, 1977, p. 95).

Rural schools are besieged by a multitude of specific problems. Most of the dilemmas are directly related to the negative traits of rural students, schools, and communities cited previously. The subject of rural school problems and solutions has been stated quite clearly by Benson and Barber, 1974; Cyr, 1954; Dawson, 1953; De Good, 1960; Edington, 1976, 1978a, 1978c; Edington and Conley, 1973; Edington and Stans, 1973; Isenberg, 1967; Iwatoma, 1963; Jongeward, 1974; Morrisett, 1950; Sher, 1977; Sher and Rosenfeld, 1977; Truesdell, 1969; Weeks, 1972; and others.

Most of the problems and proposed solutions involve four major areas of concern: Organizational patterns and characteristics, financial considerations, access and the quality of educational services, and rural development and involvement. Natchtigal (1980) claimed the key to solving rural educational problems is by accepting "rural reality" which he delineated as:

> ...accepting the fact that rural communities and schools are different from urban communities and schools;
>
> ...accepting the fact that rural communities differ from each other and that interventions to improve rural education must recognize those differences;

> ...accepting the fact that rural schools and rural communities operate as a single integrated social structure;
>
> ...accepting the fact that doing things to or for rural communities is inconsistent with rural tradition (p. 33).

Extending the last point, Edington and Conley (1973), Jongeward (1974), and Sher (1977) indicated that rural people want to control their own schools and must be actively involved in all reform efforts.

For years the problems of rural areas and rural education were greatly neglected. Edington (1978) concluded that, for the most part, rural youth were ignored by the Great Society programs. The President's National Advisory Commission on Rural Poverty (1967) stated:

> Rural adults and youth are the product of an educational system that has historically short-changed rural people. The extent to which rural people have been denied equality of educational opportunity is evident from both the products of the educational system and the resources that go into the system. On both counts, the quality of rural education ranks low (p.41).

Since that time more effort and energy has been focused on the problems of non-metropolitan areas. For example, the Rural Development Act of 1972 was approved and the Office of Rural Development within the Health Education and Welfare Department, the Rural Education Subcommittee of the Elementary and Seconary Education Task Force, and the Senate Select Committee on Equal Educational Opportunity were all established. Only minimal progress, though, has been witnessed.

Fletcher (1980) felt the greatest hope for solving rural problems in general and rural education problems in particular is to develop a national rural constituency and action agenda. Perhaps the most encouraging development has been the rise of professional rural organizations and advocacy groups such as National Rural Center, National Rural Association, Rural Education Association, People United for Rural Education, Small Schools Committee of the American Association of School Administrators, Rural/Small School Centers, Congressional Rural Caucus, Regional Education Laboratory and Resource Centers, National Federation for the Improvement of Rural Education, Organizations Concerned About Rural Education and National Forum on Rural Education. Other positive signs are that during 1979 the National Institute of Education made rural research a priority (Klees & Jess, 1980) and the Office of Rural Education has been established and placed under the Assistant Secretary for Vocational and Adult Education within the new federal Department of Education.

In 1979 many national rural leaders representing various organizations and governmental agencies participated in the National Seminar on Rural Education. Participants called for actions to end neglect and discrimination against rural areas, provide special support for dealing with the unique problems of education within rural areas, and recognize education as a critical component in any strategy of rural development (Jacobsmeyer, 1980). Twenty-eight specific recommendations were formulated and later discussed in depth at regional rural roundtables before submission to the Bureau of Elementary and Secondary Education. The effectiveness of this increased support and concern for rural America and rural education has yet to be determined.

In summary, the rural school population comprises a significant proportion of the total school enrollment in this country. Many positive and negative characteristics have been attributed to rural schools, and rural educators face numerous unique and confounding problems. Although many solutions have been offered, rural schools seem particularly handicapped by inequality in treatment, lack of research and global planning, and the imposition of inappropriate urban models.

Development of Special Education in Rural America

Rural special education is actually a subcomponent of both the rural education and special education movements in this country. Special educational services in rural areas evolved through experiencing the same struggles encountered by both rural education and special education.

1800-1900

The movement to provide services for handicapped children was transplanted to the United States from Europe during the early nineteenth century. Clergymen and physicians such as Dr. Samuel Gridley Howe, Dr. Harvey B. Wilbur and Reverend Thomas Hopkins Gallaudet were early leaders of the cause. This era was characterized by optimism as the belief was widely shared that the judgment and intelligence of handicapped children, especially of those who appeared mentally subnormal, could be increased through proper training methods (Butler, 1969; Goldstein, 1978; Man & Sabatino, 1976).

In the earliest years, attention was directed to those most obviously different--blind, deaf, "disturbed", and seriously retarded (Kauffman & Hallahan, 1981). During this period private and public residential schools or institutions were established. The first such facility was founded for the deaf in 1817 in Hartford, Connecticut. State operated and private asylums opened for other exceptionalities in several states by 1850 (Cruickshank & Johnson, 1958; Gearheart, 1980; Reynolds & Birch, 1977). Most of these facilities were located in cities in the East, but by the turn of the century a handful were established west of the Mississippi River (Gearheart, 1980).

Optimism for the plight of handicapped children was maintained until after the Civil War, but soon the focus of energy switched from rehabilitation to segregation (Goldstein, 1978; MacMillan, 1977; Mann & Sabatino, 1976). Perhaps the key to this wane in interest was that much energy seemed directed toward development of a new, post-war industrial society and a reformed educational system (Kauffman & Hallahan, 1981).

Lloyd Dunn believed the development of public supported special programs began with the passage of compulsory education laws (Aiello, 1976). Rhode Island passed the first such law in 1840 followed by Massachusetts in 1851 and nearly all states by the turn of the century (Hoffman, 1975; Sarason & Doris, 1971). Prior to this, handicapped children in rural and urban areas were institutionalized, rarely enrolled in schools, or were "dropped" in the earliest grades.

Heck (1940) noted:

> Public education did not take much interest in such special schools or classes until compulsory-attendance laws came into being. These laws forced all children of given ages into school; this brought to the attention of educators a group of children who for various reasons had previously been eliminated at an early age; they had not, therefore, caused the schools any trouble. In the last decade of the nineteenth century, the problem of helping these children was new only in the sense that it could no longer be ignored; it had always existed (p. 2).

The first special education classes were established near the end of the nineteenth century. Although the early history of the founding of special classes is difficult to follow due to varying definitions of "special" programs and exceptionalities (Sarason & Doris, 1979), Wallin (1968) reported the opening of the first public school for the deaf in Boston in 1869, a truancy class in New York in 1874, a disciplinary class in Cleveland in the 1870s and a unit for the mentally subnormal in Cleveland in 1875. By the turn of the century several cities had established public special education classes.

In summary, the nineteenth century witnessed the rise of the special education movement, starting with the establishment of institutions and culminating in the creation of special education classes in some public schools. During this period there were few educational options available to the rural handicapped, resulting in nearly all being unserved.

1900-1945

From 1900 to 1910 there was a proliferation of classes for exceptional children. By 1911 special public school classes had been established in over 100 large cities, and several states began to subsidize programs for the handicapped by funding the excess costs of providing these services (Aiello, 1975; Van Sickle, Witmer & Ayres, 1911).

Gradually the federal government became involved in special education services by conducting surveys, maintaining data on numbers of handicapped children served, and by recognizing the problems and efforts of states in the education of defectives and delinquents. In the U. S. Bureau of Education Bulletin of 1906, the following summary statement appeared:

> The development of the public school system so as to provide for the instruction of the defective classes of children is among the interesting phenomena of present day educational activity. The enactments relating to the education of deaf and dumb, blind, and crippled and deformed children ... are evidence of the intent of these states to leave no child without the scope of the influence of the public schools, and are consequently of a significant character (Elliott, 1906, p. 126).

Although some records on residential institutions and special day schools were kept previously, biennial surveys commencing in the early 1900s provided information on public school provisions for the handicapped. Perhaps the most frequently cited survey of the time was conducted in 1911 by Van Sickle and his associates for the Bureau of Education. This study along with others of its time typically canvassed only the largest cities (population over 10,000) detecting greater and greater expansion of programs over the years. Some researchers (Coldstein, 1978; Wallin, 1968), though, have questioned the reliability of these early investigations.

Several educators (Berry, 1930; Martens, 1931; Solenberger, 1918) early on recognized the confounding problem of providing special services in rural areas. For example, Gaumnitz (1930) in a survey of 421 rural school districts in 5 states found only 52% of the identified atypical students receiving special services and nearly a third so classified were not enrolled in any school. Although school attendance was supposedly mandatory, schools did not always provide educational services for all children and uncounted numbers remained unserved, especially those in rural communities (Goldstein, 1978).

Perhaps the first seed for the development of special education services in rural areas was planted at the 1930 White House Conference on Child Health and Protection. Many consider this assembly a milestone in the history of special education (Aiello, 1975; Heck, 1940). The series of White House Conferences on Children and Youth began in 1909, but it was not until 1930 when an extensive report on special education, incidence figures, and a Children's Charter were formulated that national attention began to be focused on the handicapped (Abraham, 1976).

One section of the charter outlined the proposed rights of handicapped children:

> For every child who is blind, deaf, crippled, or otherwise physically handicapped, and for the child who is mentally handicapped, such measures as will early discover and diagnose his handicap, provide care and treatment, and so train him that he may become an asset to society rather than a liability. Expenses of these services should be borne publicly where they cannot be privately met (Wilson, 1932-33, p. 371).

In reference to the rural handicapped, it was concluded:

> The problem in the rural districts and villages, because of the limited number of children to be served in any one district, is to provide the services enumerated above for the urban districts....We must recognize that these children in rural districts will never receive an adequate education until proper facilities are provided for their training. Unless such facilities are provided these children must go through life with a double handicap (Otto, 1934, p. 513).

The two most important results of the conference were that increased federal interest was generated and special education began to be recognized as a legitimate member of the education community (Aiello, 1975). The movement for the education for all began to emerge with spill over effects which reached beyond the boundaries of the cities.

In reaction to the White House Conference, educators and national organizations began to address the needs of exceptional children, including the rural handicapped. At the National Education Association Conference in 1935, three presentations (Heffernan, 1935; Sholty, 1935; Wait, 1935) were made on the topic of rural schools and the handicapped. Helen Heffernan (1935), Chief, Division of Elementary Education and Rural Schools, Sacramento, California, noted:

> Even for cities the problem of meeting the needs of exceptional children is only beginning to be explored. Naturally, the rural school, where financial support is meager, where teachers are relatively less well trained, where pupil population is scattered over large areas and where the attitude of the public may be apathetic or indifferent, is 'bringing up the rear' in providing adequate opportunity in the field of special education (p. 487).

Presentors offered the following solutions to the "rural problem": (a) increased use of traveling child guidance clinics, (b) widening of the rural curriculum, (c) altering teacher perspectives in the treatment of the individual child, (d) increased state supervision and regulation, and (e) stimulation of local interest in programs.

The first conference of the State Directors of Supervisors of Special Education was held in Washington, D. C. in the fall of 1938. One topic of concern was the development of feasible means in which to meet the needs of exceptional children in rural areas. Although several delivery models were suggested, it was concluded that the states must recognize the problems and provide expedient programs (Martens, 1940).

The American Association of School Administrators sponsored a publication in 1939 entitled Schools in Small Communities, which briefly commented on the problem of educational services for the rural handicapped. Recognizing the financial constraints of small, rural schools, a five point plan was recommended:

> 1. To provide teachers with a general background of the possible physical, mental, and social maladjustments.
> 2. To help each teacher recognize the existence of maladjustment in every classroom.
> 3. To assist teachers in studying individual children so as to locate various types of deviates.
> 4. To apply 'first aid' to those exceptional children who may respond to preliminary measures.
> 5. To seek further help from specialists when the preliminary measures are not adequate (AASA, 1939, p. 137).

Amoss (1939), Berry (1940, 1941), Cohen (1940), Cutts (1941), Doll, (1939), Heck (1940), Layman (1940), Otto (1937), and Smith (1937) also made contributions to the rural special education literature. Berry (1940) spoke for many educators when he stated:

> The neglect of special education in these smaller communities is a matter of great concern to all who are interested in equality of educational opportunity for the exceptional child....The fundamental mistake which has been made in trying to provide special education for exceptional children in smaller communities and rural districts has been in assuming that the big-city mode of special education can be carried over without change to these smaller communities and rural areas (p. 35).

Harry Amoss (1939), Provincial Inspector for Auxillary Classes in Ontario, Canada, provided one of the first reports of a wide scale special education system in a rural area. Rejecting the options of establishing county boarding schools or centrally locating classes so students could be transported daily, provisions were made to offer services for all exceptional children in their home schools. Amoss also described the incidental and county inspectorate survey methods employed in rural areas.

Various strategies to provide special education services to rural areas were suggested by the above mentioned educators, including: (a) retain handicapped students in class and concentrate on their strengths, (b) augment the skills of rural teachers, (c) increase state financial aide, (d) devise new types of organizations to secure special educational opportunities, (e) home instruction, (f) county classes, and (g) mixed classes of exceptional children. Several educators (Berry, 1930; Martens, 1931, 1937; Otto, 1934; Williams, 1937) strongly stressed the need for states to assume responsibility for rural special services.

Despite this emergence of interest in the rural exceptional child, it was estimated in 1940 that in large cities (over 100,000 population) special education was provided for 4% of the total school enrollment, while in medium cities (population between 99,999 and 10,000) 2% of the total school enrollment were provided special classes; but in towns, villages, and rural areas (population less than 10,000) only a small fraction of 1% received those services (Amoss, 1940).

Near the end of World War II, the White House Conference on Rural Education (1944) was assembled to establish plans for the peacetime rejuvination of the rural education system. Many of the country's best known rural educators met to discuss the problems in rural communities and rural schools to steer the "mired wheel" of rural education on to the road of educational progress (Dawson & Hubbard, 1944). The Charter of Education for Rural Children was formulated,and the amendments proposed reflected the familiar theme of right to education for all children. One of the many conclusions reached by the conference dealt specifically with rural special education services.

> The school's service to rural children is not complete until adequate provisions are made for the educational development of exceptional children--children who thru heredity, thru neglect, thru accident, or thru other causes cannot normally benefit from the regular program and processes (Dawson & Hubbard, 1944, p. 102).

Awareness was developing, but there was no absolute sense of commitment to the handicapped in rural areas.

To summarize, starting in 1930 a trickle of interest emerged in rural special education. From the much broader perspective of equal educational opportunity for all, the White House Conference on Child Health and Protection, the National Education Association and other organizations began to present the issues of rural special services. Although an awareness began to evolve, the needs of the rural handicapped were not high on the agendas of these groups, and there appeared to be much more rhetoric than action. Educators began to develop service delivery models and strategies for the rural handicapped, but the situation was aptly summarized by Graham (1964):

> Until World War II, children and youth with handicaps who resided in less populated areas received needed special education by travelling considerable distance to attend city programs, or they were served in state residential schools. There were practically no local special education programs available to children from remote and sparsely settled areas because there were usually neither enough children in each type of handicap nor sufficient financial support in a single small community to make this provision possible (p. 28).

1945-1975

Following World War II, the special education movement gained tremendous momentum. The growth has been attributed mainly to the return of many disabled veterans to the mainstream of society and the emergence of parent advocacy organizations (Cruickshank & Johnson, 1958; Hewett, 1974; Reynolds & Birch, 1977). Similarly, a greater concern was unfolding for the entire field of rural education.

Although public school programs for the exceptional student declined in number during the 1940s, a significant increase was witnessed after the war (Cruickshank & Johnson, 1958; Hewett, 1974; Kauffman & Hallahan, 1981; Reynolds & Birch, 1977). Services to rural areas were still less than adequate. Porter (1953) estimated that a large number of the 4 million unserved exceptional children in the country were from rural areas.

Gradual improvement in special services in rural areas occurred due to efforts and activities at three levels. First, there was a greatly expanded attempt on the part of local education agencies, co-operatives, and university researchers to devise and implement an array of service delivery alternatives. Next, at a state and national level, educators, administrators and advocates for rural special education began to join forces through the organizing of conferences and workshops. Finally, the federal government extended its influence and interest through the work of national conferences, task forces and panels, and by the support of extremely critical national legislation.

At the local or district level some research and a handful of programs were conducted in the rural areas of the states of Alabama (Frith, 1975), Alaska (Midkiff, 1964), California (Chase & Barker, 1952; Keogh, et al., 1974; Loveless, 1967), Colorado (Thornton, 1975), Illinois (Porter, 1953), Indiana (Porter, 1953), Iowa (Hampton, 1960, 1961), Maine (Annas, 1959), Minnesota (Weatherman & Hollingsworth, 1975), Mississippi (Curtis, 1969), Nebraska (Doerr, 1974), New Mexico (Smith & Pasternack, 1977), New York (Chase & Barker, 1952; Morris, 1956; Searls, 1967), Pennsylvania (Porter, 1953; Lehmann, 1971), Tennessee (Murfeesburo Public Schools, 1973), Utah (Hofmeister & Atkinson, 1975), Vermont (Christie, McKensie & Burdett, 1972; McKenzie, Egner, Knight, Perlman, Schneider & Garvin, 1970; McKenzie Hill, Sousie, York & Baker, 1977), Virginia (Ford, 1972), and Wisconsin (Goldin, 1952; Melcher & Blessing, 1957; Parker, 1970; Williams, 1948).

While it was recognized that urban school systems had the advantages of greater per capita wealth, better trained staff, centralized school population, superior means of publicity, and more agencies interested in the handicapped (Berry, 1940; Melchor & Blessing, 1957), many creative solutions were being developed for rural areas. Strategies that involved staffing included use of consultant teachers, release time, intensive inservice and student teachers. Suggestions for revision of organizational components embraced the development of cooperatives, regional assessment centers, clinical service extensions, co-ordinating units and resource rooms. Generally, these educators were against exclusion and segregation of exceptional children and commonly enlisted support of parents of the handicapped. Melcher and Blessing (1957) recognized:

> With an awakened and well-informed public, and the impetus of an enlightened militant parents group, the demands for extension of special services to the rural areas have increased (p. 207).

During this period seven major interstate/national conferences were conducted specifically on the topic of rural special educational services:

1. Great Plains Conference on Special Education, sponsored by the Council for Exceptional Children and Eastern Montana University (1951).
2. National Research Conference on Special Education Services in Sparsely Populated Areas, sponsored by the Western Interstate Commission for Higher Education and the Montana State Department of Public Instruction (1966).

24

3. Follow-up Conference on Special Education Services in Sparsely Populated Areas, sponsored by the Western Interstate Commission for Higher Education and the Montana State Department of Public Instruction (1967).
4. Special Conference on Emerging Models of Special Education for Sparsely Populated Areas, sponsored by the Council for Exceptional Children (1971).
5. Delivery of Special Education Services in Rural Remote Areas, sponsored by New Mexico State University, University of Oregon, University of Utah, National Association of State Directors of Special Education and the Northwest Regional Educational Laboratory (1973).
6. Western States Topical Conference: Implementing Special Education Services in Rural Remote Areas, sponsored by The Rocky Mountain Regional Resource Center, the Northwest Regional Resource Center and the Coordinating Office for Regional Resource Centers (1975).
7. Administration of Special Education for Rural and Sparsely Populated Areas, sponsored by the University of Minnesota and U. S. Health, Education and Welfare Department (1975).

Although the conferences were convened over a 24-year period and involved various participants from a myriad of sponsoring organizations, there was a strong common focus on establishing research objectives and priorities. The most critical needs identified included the areas of parent and community involvement, legislation and funding for special education, professional staff recruitment and development, and special education delivery systems. Isenberg (1966) noted at the National Research Conference on Special Education Services in Sparsely Populated Areas that there was an absence of basic information regarding children living in sparsely populated areas and having special education needs: "Who are they? Where are they? What do they need? Are they being served now? From what sources and how are they receiving help?" (p. 7). Many ideas, global strategies, and situation specific solutions were generated at these gatherings, but Vergason (1971) astutely noted at one conference that:

> The solution to delivering appropriate services to handicapped children in rural areas is not a simple one and certainly not as simple as special class vs. regular class or resource vs. special class (p. 14).

Rural special education is actually a subcomponent of rural education and special education and has benefited from movements to improve both entities. In the years following World War II, the federal government sponsored numerous conferences, committees, panels and task forces (White House Conference on Children and Youth, 1950, 1960, 1971; National Outlook Conference on Rural Youth, 1967; National Advisory Council on the Education of Disadvantaged Children; Task Force Under Rural Education, etc.) to approach problems of the handicapped, youth, and rural life in general. Although rural special education issues were addressed at least superficially at these gatherings, three reports in particular were most critical for the cause of the rural handicapped: Report of the National Advisory Committee on Rural Poverty, (The People Left Behind) 1967; Report of the Conference on Problems of Rural Youth in a Changing Environment, 1963; and Report of the President's Panel on Mental Retardation, 1962.

The Report of the Conference on Problems of Rural Youth in a Changing Environment was later aptly entitled Rural Youth in Crisis: Facts, Myths, and Social Change. The topics of rural education and problems of rural youth were thoroughly explored with great emphasis placed on exceptional children. In short, the conference concluded that rural youth were experiencing extremely serious problems and it was a crisis which required nothing short of a national, unified effort to overcome (Burchinal, 1967). The truly forgotten child was identified as the one who lived in a rural area and was handicapped (Burchinal, 1967).

The document, The People Left Behind, revealed enormous problems not only with rural youth but with the entire rural sector of society. The National Advisory Commission on Rural Poverty (1967) charged that rural communities were areas of involuntary tragedy where people were not even afforded equal access to opportunity. Shocking data on rural poverty, unemployment and inequality were published. One of the strongest recommendations was to completely overhaul the rural educational system from preschool programs to adult education.

The election of John F. Kennedy to the Presidency of the United States proved to be a tremendous impetous to the cause of handicapped individuals in general and to the mentally retarded in particular (Gearheart & Wright, 1979; Hewett, 1974; Sarason & Doris, 1979). Kennedy appointed the Panel on Mental Retardation in October 1961, and a year later a 200 page report including 95 recommendations was completed. Although none of the suggestions specifically identified rural special education problems, practically all proposals had applicability to rural areas. As a result of the leadership shown by the President and the efforts of professional organizations and advocacy groups, a series of legislation was passed over the next decade culminating in the passage of Public Law 94-142—Education for All Handicapped Children Act. (For details of legislative enactments see Gearheart, 1980.) This law guarantees a free, appropriate education for all exceptional students, including the rural handicapped.

This 30-year period was distinguished by an increase in research and rural special education program implementation at the local level, greater interstate/national cooperation amongst the small cadre of administrators and special educators who served the rural handicapped, and the passage of historic legislation for all exceptional children. After years and years of minor advances, special education services for the rural areas enjoyed a major victory with the passage of Public Law 94-142. Helge (1980) collected data on handicapped students, professional staff, provision of services, parental involvement, due process procedures, and organizational structures in 75 rural local educational agencies and cooperatives nationwide. The survey compared rural special education services before and after passage of Public Law 94-142. Data on availability of services (presented in Table 1) are indicative of the woefully inadequate state of special education before this legislation. One rural superintendent surveyed stated:

Table 1

Availability of Services Before Public Law 94-142

Services	Percentage Before Public Law 94-142
No services for any handicapped students	05%
No Services for severely handicapped students	09%
No services for 16-21 year old handicapped students	27%
No health services	19%
Services for 3-4 year olds	07%
Services for 19-20 year olds	36%
Services for multi-handicapped	0%
Services for physically handicapped	07%
Services for visually handicapped	17%
Services for emotionally handicapped	09%
Services for hearing impaired	25%
Services for learning disabled	27%

Note. From A National Comparative Study Regarding Rural Special Education Delivery Systems Before and After Passage of PL 94-142 (by D. Helge, 1980, p. 42).

> It is typical for a LEA to wait for a mandate saying education must be improved, and P. L. 94-142 has been the only kind of motivation which would have created real special education programs (Helge, 1980, p. 84).

1975-1981

Since the passage of Public Law 94-142, there has been a burgeoning of interest and activity in the area of rural special education. The Office of Special Education, Department of Education (formerly Bureau of Education for the Handicapped, Health Education and Welfare Department) has realized a critical role in this movement. The Rural Special Education Task Force and the Rural Initiative Committee were established and considerable financial resources were earmarked for research. Of note was funding for Morrisey's (1976) Special Project Report on Rural Education and the Handicapped, support for the establishment of the Handicapped Children's Early Education Program (HCEEP) Rural Network and its series of conferences and monographs, and approval of various activities through the National Rural Research and Personnel Preparation Project (NRP) at Murray State University. Dr. Doris Helge, Project Director of NRP, conducted a four year research study which began in June 1978 and involved five project phases: (a) characterization study of rural education service delivery systems to identify facilitating and hindering factors which determine success or failure of district compliance with Public Law 94-142, (b) national comparative study regarding rural special education delivery systems before and after implementation of Public Law 94-142, (c) development of profiles interrelating effective service delivery strategies and particular community and district characteristics,

(d) development of interdisciplinary models of personnel preparation for effective service delivery to rural subcultures, and (e) field testing and dissemination of personnel preparation models for use in pre- and inservice training.

The National Rural Research and Personnel Preparation Project through the office of Special Education sponsored an Institute for Change Agents in Rural Special Education, the NRP Newsletter, the National Conference Regarding Personnel Preparation for Rural Service Delivery, and the National Conference on Leadership for Problem-Solving in Rural Schools (Helge, 1979, 1980). In May 1981, Dr. Helge was elected Executive Director of the American Council on Rural Special Education (Acres), a new national organization founded by individuals interested in improving services for rural handicapped students ("Permanent Organization", 1981).

The Comparative Study Regarding Rural Special Delivery Systems Before and After Passage of P.L. 94-142 indicated a significant general improvement in programs and services offered and types and ages of exceptional students serviced (Helge, 1980). The most significant achievements in the 75 districts/cooperatives surveyed included: (a) a 92% average increase in the number of handicapped students identified and served, (b) an increase in special education services up to 1,520%, (c) fostering of parental involvement, and (d) development of due process procedures (Helge, 1980). Despite these very positive accomplishments, one must view them in light of the scarcity of provisions available before 1975.

Helge (1979) described today's rural special education programs:

> Frequently, no special education or supportive services staff exists. In fact, the majority of the rural districts in the United States consist of a superintendent, a part- or full-time principal (sometimes also serving as an instructional staff member), several regular educators, and one or more general special educators who may serve as the teacher of a self-contained unit or as a resource to one or more districts, spread over as many as 400 miles (pp. 1-2).

In the Congressional report, Progress Toward a Free Appropriate Public Education (1979), it was concluded that provision of adequate services for heterogenous groups of rural exceptional children was an administrative, resource, and planning challenge for staff already over burdened and under supported. Particular problems identified included personnel availability, limited fiscal resources, and population sparsity. The passage of Public Law 94-142 brought promises previously denied the rural handicapped children, but before quality services can be delivered, a plethora of problems must be overcome ("Special Education in Rural Areas", 1980).

Heller (1975), Sher (1977), and Cole and Ranken (1981) attributed many of today's special education problems in rural areas to the imposition of an urban model of education on nonmetropolitan areas. Schrag, et al., (1979) and Helge (1979, 1980) considered the 5.3% nonenrollment rate of rural school children a critical dilemma. This rate is twice that found in urban areas, and the major reasons cited are lack of special education services and lack of parental involvement concerning such services ("BEH Lacks Rural", 1979, Schrag, et al., 1979). To extend this problem further, approximately 130,000 students are serviced as handicapped in rural areas, but up to 1.5

million children with handicapping conditions (10% of the population) might be expected to reside in these areas.

The development of secondary handicaps resulting from unserved primary handicapping conditions has been analyzed by Helge (1980) and Isenberg (1970) as an area of concern, while Sher and Rosenfeld (1977) and Stile (1980) have expressed interest in the quality of special education services in rural areas. Competencies of rural special education teachers was an issue raised by Blasi (1981), and other staff development questions/problems were posed by Cole, Smith and Ranken (1981), Vasa and Steckelberg (1981), and Helge (1981). Various educators (Cole, Stile, Kitano, Garner, Brummett, Rankin, 1979; Cordell, 1975; Glenn & Summers, 1975; Harris & Mahar, 1975; Hoover, 1978; Latham, 1981; Reynolds & Birch, 1977) have also discussed problems related to rural special education.

Concern over fiscal matters is a common theme shared in much of the above noted literature. It has been estimated that the costs of educating a handicapped student are twice that of the nonhandicapped (Bernstein, Kirst & Marshall, 1976) and that costs for special education programs in small school districts have risen the highest of all school districts ("Small Districts", 1979). Although small districts must comply with all the regulations of Public Law 94-142, only those districts qualifying for more than $7,500 of federal funds receive support directly. Public Law 94-142 is designed to fund excess costs of educating the exceptional child, but to date support levels have failed to reach the proposed percentages of the original legislation.

Numerous solutions have been offered in response to some of the above mentioned problems facing rural school education programs. Practices with the greatest potential impact include: (a) increased use of para-professionals, volunteers, and other community resources, (b) development of cooperatives and cooperative agreements between districts, (c) augmented parental participation, (d) cooperation with agricultural extension services, (e) establishment of revised federal financing formula, and (f) reformation of preservice training. Helge (1976, 1979), though, has indicated that generally personnel in rural areas are not aware of alternate strategies for serving rural handicapped children which have been shown to be more cost efficient and programmatically more effective. Burello and Sage (1978) noted individuals responsible for special education administration in rural areas usually have other responsibilities as well and cannot be concerned solely with special services issues. Also, it is critical to realize that each school situation is unique and successful programs are usually those developed for specific situations and are not automatically transferable to other settings (Edington, 1976). Despite significant improvement, serious problems still prevail for many rural special education programs.

Today, rural special education is struggling to assume its own independent identity within the education community. Meanwhile the battle to ensure appropriate programming for all handicapped children is continuing. Public Law 94-142 has been enacted and regulations established but total compliance in rural areas is far from being achieved.

Research on Rural Special Education

The problems rural special educators face today are to some extent common to rural education in general (Fletcher, 1980). Only extremely limited research has been conducted in rural education, and even less data is available on rural special education (Blasi, 1981; Helge, 1979; Jordan, 1969; Keogh, et al., 1974; Schrag, et al., 1979; Urban, 1972). Beginning in the 1930s various articles have appeared in the literature which have either described the problems and solutions of isolated, rural special education programs or have reviewed the general needs of the rural handicapped from a global perspective. Jordan (1969) found many repetitive statements within the rural special education body of literature. Despite a general awareness of problems in the area of rural special education, only limited systematic data gathering has been employed.

In 1966 at the National Research Conference on Special Education Services in Sparsely Populated Areas, numerous basic research questions were posed, but to date most remain unanswered. At the follow-up conference a year later, it was generally agreed that individual states had a responsibility for some basic data collection and preliminary investigation concerning respective rural special education needs. The National Advisory Committee on Handicapped Children in its first annual report recommended initiation of research effort and demonstration projects in rural areas (Urban, 1972). In 1979 at the series of regional rural roundtables sponsored by the U. S. Office of Education, one of the highest priorities discussed was the creation of a rural research agenda. Coward (1980), while discussing rural families and communities, stated:

> Certain subpopulations of rural America suffer even greater obscurity—Unfortunately, many of the latter are the most vulnerable: the rural elderly, the rural migrant minority, the poor, and the handicapped. If investigations to better understand these populations can be completed, if data banks can be constructed, and if our understanding can be solidified, then we can proceed in a more systematic fashion to address the needs of rural families (p. 8).

Perhaps the first significant study in the area of rural special education was conducted by Chalfant in 1967, when he reviewed the economic and demographic factors underlying the public school provisions for exceptional children in Illinois. Rural school districts were found least likely to provide special education services (Chalfant, 1967).

Charles (1969) circulated a nationwide questionnaire in which rural teachers were requested to indicate needed improvements in rural teacher training. One of the most frequently mentioned areas was training in diagnosis and treatment of exceptional children. At the National Conference Providing Technical Support and Assistance to Non-Urban School Systems in Implementing Comprehensive Special Education Programs in 1976, participants were queried as to their problems and needs. Although individuals represented school districts ranging in student membership from 694 to 30,000, greatest concerns were need for appropriate personnel preparation (85%) and adequate special education programming (70%) (Helge, 1976).

In the fall of 1979, the HCEEP Rural Workshop distributed the Conference Planning Survey to 227 projects in the network. Fifty-four responses were obtained to open-ended questions asking for a listing of critical issues facing rural service providers and critical issues involving families of handicapped children. For rural service providers, areas identified were transportation, recruitment, and funding; while the key concerns delineated for families included transportation, attainment of appropriate services, information on available services, payment for services, and isolation from programs and other parents (Hutinger, et al., 1981). Later, solutions to problems were solicited through the Rural Project Survey, an open-ended, exploratory questionnaire which reflected the previously identified needs in the earlier study.

The objectives of the National Rural Research and Personnel Preparation Project have previously been outlined, and findings of the phase comparing services before and after Public Law 94-142 have been described. Simultaneously 19 (38%) of the nation's state education agencies were involved in phase one to identify problems in implementing special education programs in rural areas. In the southwest, New Mexico was not polled as Arizona and Texas were the only participants. Data were collected through a formal questionnaire and interview process. Later, state education agency personnel from the 19 states were requested to recommend two upper and two lower performing rural districts/cooperatives (least and most effective 5%) for inclusion in further study. Seventy-five districts/cooperatives participated in this aspect of the study which incorporated on-site visits and questionnaire completion. One or more administrators, two support personnel, two regular and two special education teachers, and three to four parents were queried in each district/cooperative. Utilizing data from the education agencies and districts/cooperatives, the following 16 critical problem areas for rural special educators were identified:

1. Difficulties recruiting and retaining staff;
2. Funding inadequacies;
3. Resistance to change;
4. Need for staff development;
5. Long distances between schools and services;
6. Transportation inadequacies;
7. Icy, muddy, or marginal roads;
8. Curltural differences;
9. Problems providing support services;
10. Involving parents of exceptional students;
11. Problems with migrant populations;
12. Problems insuring procedural safeguard requirements;
13. Procedural/policy issues;
14. Problems related to specific age populations;
15. Problems obtaining responsiveness from inservice and preservice programs; and
16. Needs for technical assistance (Helge, 1979, 1980).

In addition, preliminary data were collected identifying types, characteristics, and reported effectiveness of special education strategies utilized.

Helge's research in the area of rural special education represents a tremendously significant initial step towards addressing the problems of rural handicapped school children. It is important to note, though, the limitations of a nationwide survey that samples only 75 school districts/cooperatives. In reporting research results, Helge (1979) warned:

> However, as non-participating states may vary in terms of their educational practices and procedures, caution must be exercised in assuming that data reported in this document are accurate reflections of specific education practices and problems in states which were not surveyed (p. 81).

As the survey data indicated, different regions of the country displayed varying perceptions of problems. Furthermore, strategies that have demonstrated success in one region may be counterproductive in another.

To recapitulate, although some national concern for the provision of special education services in rural America is evolving, there is a paucity of data presently available. The few studies conducted in this area indicated rural special educators are encountering various confounding dilemmas.

REFERENCES

Abraham, W. The early years: Prologue to tomorrow. Exceptional Children, 1976, 47(6), 332-338.

Abt, P. W., Bock, G., English, P., & Marx, T. One year out: Reports of rural high school graduates. Cambridge, MA: Abt Associates, 1977. (ERIC Document Reproduction Service No. ED 148 010)

Aiello, B. Especially for special educators: A sense of our own history. Exceptional Children, 1976, 42(5), 244-252.

American Association of School Administrators. Schools in small communities. American Association of School Administrators 1939--Seventeenth Yearbook, 1939, pp. 1-608.

Amoss, H. Special education in rural communities. Journal of Special Education, 1958, 5, 73-95; 93.

Annas, P. A. Development of a program for mentally retarded children in rural schools. Augusta, ME: Maine State Department of Education, 1959. (ERIC Document Reproduction Service No. ED 002 988)

Babbie, E. R. Survey research methods. Belmont, CA: Wadsworth, 1973.

Barber, G. N. Special education division report. New Mexico Superintendent of Public Instruction Twenty-fourth Biennial Report, 1958, pp. 4-6.

Beale, C. L. Making a living in rural and small town America. Rural Development Perspectives, November 1978, pp. 1-5.

BEH lacks rural special education strategy, expert says. Education of the Handicapped, June 6, 1977, p. 5.

Benson, C., & Barber, R. Intermediate educational units and their promises for rural education. Las Cruces, NM: New Mexico State University, ERIC Clearinghouse on Rural Education and Small Schools, 1974. (ERIC Document Reproduction Service No. ED 088 632)

Bernstein, C. D., Kirst, M. W., & Marshall, R. S. Financing educational services for the handicapped. Reston, VA: Council for Exceptional Children, 1976.

Berry, C. S. The education of handicapped children in rural schools. School Life, 1930, 16(1), 9.

________. In small communities. Phi Delta Kappan, 1940, 23(2), 34-35.

________. General problems of philosophy and administration in the education of exceptional children. Review of Educational Research, 1941, 11(3), 253-259.

Blasi, J. F. *Competencies and needs of rural special educators*. Unpublished manuscript, Portales, NM: Eastern New Mexico University, 1980.

Borg, W. R., & Gall, M. D. *Educational research: An introduction* (3rd ed.). New York: Longman, 1979.

Brown, et al. v. Board of Education of Topeka, et al. *United States Reports*, 347 U.S. 483 S. Ct., 1954.

Burchinal, L. G. (Ed.) *Rural youth in crisis: Facts, myths, and social change*. Washington, D.C.: U.S. Department of Health, Education, and Welfare, 1967.

Burdin, J., & Poliakoff, L. (Ed.) *In-service education for rural school personnel*. Washington, D.C.: ERIC Clearinghouse on Teacher Education, 1973. (ERIC Document Reproduction Service No. ED 073 082)

Burello, L. C., & Sage, D. D. *Leadership and change in special education*. Englewood Cliffs, NJ: Prentice-Hall, 1979.

Butler, N. M. *Education in the United States*. New York: Arno Press and the New York Times, 1969.

Carlson, W. F. *A plan for organizing special education for exceptional children in Carlsbad, New Mexico*. Unpublished educational specialist's thesis, New Mexico State University, 1959.

Charles, E. B. The preparation of teachers for small rural schools. (Doctoral dissertation, University Arizona, 1969) *Dissertation Abstracts International*, 1969, 30, 1892-A. (ERIC Document Reproduction Service No. ED 027 999)

Chase, F. J., & Baker, J. F. Rural education today. In N. B. Henry (Ed.) *The Fifty-first Yearbook of the National Society for the Study of Education*, 1952, pp. 89-123.

Christie, L. S., McKenzie, H. S., & Burdett, C. S. The consulting teacher approach to special education: In-service training for regular classroom teachers. *Focus on Exceptional Children*, 1972, *4*, 1-10.

Cicourel, A. V. *Method and measurement in sociology*. New York: Free Press, 1964.

Clarke, S. C. *Alberta grade three achievement studies, Fall, 1978*. Edmonton, Alberta: Alberta Department of Education, 1978. (ERIC Document Reproduction Service No. ED 179 552)

Cohen, M. J. The visually handicapped child in the rural community. *Journal of Exceptional Children*, 1940, *6*, 260-263.

Cole, J. T., Smith, G. L., & Ranken, M. M. Providing services to exceptional students in rural areas: Some solutions. *The Rural Educator*, 1981, *2*(3), 7-13.

________, Stile, S., Kitano, M., Garner, A., Brummett, R., & Ranken, M. *Current problems and research needs of special education in rural remote areas: A concept paper*. Unpublished manuscript, Las Cruces, NM: Department of Educational Specialties, New Mexico State University, 1979.

________, & Ranken, M. M. Providing services to exceptional students in rural areas. *The Rural Educator*, 1981, *2*(3), 1-6.

Comptroller General's Office. *Report to the Congress of the United States: Unanswered questions on educating handicapped children in local public schools* (G.A.O. Report No. B-199396). Washington, D.C.: U.S. Government Printing Office, 1981.

Cordell, D. Disabled child in rural areas. *Exceptional Parent*, 1978, *8*(1), D21-24.

Cosby, A. G. The urban context of rural policy. *The Interstate Compact for Education*, 1980a, *14*(3), 37-38.

________. Developing a rural policy. In *R and D Speaks: Rural and Small Schools*. Washington, D.C.: National Institute of Education, 1980b. (ERIC Document Reproduction Service No. ED 197 888)

Coward, R. T. Rural families changing but retain distinctiveness. *Rural Development Perspectives*. October 1980, pp. 4-8.

Cruickshank, W. M., & Johnson, G. O. (Eds.) *Education of exceptional children and youth*. Englewood Cliffs, NJ: Prentice-Hall, 1958.

Curtis, H. A. *Special services, LeFlore County school district, Mississippi*. Washington, D.C.: Office of Education, 1969. (ERIC Document Reproduction Service No. ED 039 974)

Cutts, N. E. The mentally handicapped. *Review of Educational Research*, 1941, *11*(3), 261-271.

Cyr, F. W. Cooperating for better rural schools. *Phi Delta Kappan*, 1954, *36*, 44-46.

Dawson, H. A. Crucial issues in rural education. *National Education Association Journal*, 1953, *42*, 441-442.

________. *Rural education - A backward and a forward look*. Paper presented at National Conference on Rural Education, Washington, D.C., October 4, 1951.

________, & Hubbard, F. W. (Eds.). The White House Conference on Rural Education. Washington, D.C.: National Education Association, Department of Rural Education, 1969. (ERIC Document Reproduction Service No. ED 097 164)

DeGood, K. C. Profile of the small high school. Educational Leadership, 1960, 18, 170-172.

Division of Surveys and Field Services, George Peabody College for Teachers. Public education in New Mexico: A report of the New Mexico educational survey board. Nashville: George Peabody College for Teachers, 1948.

Doerr, A. Help for the rural LD child. American Education, 1974, 10(5), 27-29.

Doll, E. A. Boarding-home care for mental defectives. Training School Bulletin, 1939, 36, 1-10.

Downie, N. M. Fundamentals of measurement: Techniques and practices. New York: Oxford University Press, 1967.

Economic Development Division Staff. Rural America in the seventies. Rural Developmental Perspectives, November 1978, pp. 6-12.

Edington, E. D. Strengthening the small rural school. Las Cruces, NM: New Mexico State University, ERIC Clearinghouse on Rural Education and Small Schools, 1976. (ERIC Document Reproductive Service No. ED 116 845)

________. Rural Youth: The neglected minority. A Dialogue Series Monograph. Las Cruces, NM: New Mexico State University, College of Education Dialogue Series, November, 1978.

________. Rural education: Key policy-issues. The Interstate Compact for Education, 1980, 14(3), C1-C4.

________, & Conley, H. Education in isolated rural areas. Paper presented at the Science and Man in the Americas Meeting, Desert and Arid Lands Section, Mexico City, Mexico, June 1973. (ERIC Document Reproduction Service No. ED 077 626)

________, Pettibone, T., & Heldt, J. Educational, occupational, and residence aspirations and expectations for rural and minority youth in New Mexico. Las Cruces, NM: New Mexico State University, ERIC Clearinghouse on Rural Education and Small Schools, 1975. (ERIC Document Reproduction Service No. ED 116 845)

________, & Stans, P. Small schools can be better schools by building on their strength. Paper presented at the Annual Meeting of the North Central Association of Colleges and Secondary Schools, Chicago, Illinois, March 1973. (ERIC Document Reproduction Service No. ED 073 863)

Elliot, E. C. Education of defectives and delinquents. *U. S. Bureau of Education Bulletin*, 1906, *3*, 126-127.

Federal spending in rural areas: A fair deal. *Rural Development Perspectives*, U.S. Department of Agriculture, Washington, D.C., November 1978, pp. 27-29.

Fletcher, J. Special education in the broader context of national rural policy. In T. Black, D. Filderman, J. Jackson, & M. Woodard (Eds.) *Serving Young Handicapped Children in Rural America*. Washington, D.C.: U.S. Department of Education, 1980.

Ford, P. Small high schools: Myth, reality and potential. *The Bulletin of the National Association of Secondary School Principals*. 1967, *51* (317), 89-95.

Ford, F. G. Project helping hand: Innovative special education service center for a rural area. In *Innovation in Special Education*. U.S. Department of Health, Education, and Welfare Publication No. (OE) 72-30. Washington, D.C.: U.S. Government Printing Office, 1972, pp. 31-36.

Frith, G. *A project designed to increase exceptional child services to Northeast Alabama*. Jacksonville, AL: Jacksonville State University, 1975. (ERIC Document Reproduction Service No. ED 115 071)

Gaumnitz, W. H. Availability of public school education in rural communities. *U.S. Office of Education Bulletin*, 1930, *34*, 1-42.

Gearheart, B. R. *Special education for the 80's*. St. Louis: The C. V. Mosby Company, 1980.

________, & Wright, W. S. *Organization and administration of educational programs for exceptional children* (2nd ed.). Springfield, IL: Charles C. Thomas, 1979.

Glenn, G. L., & Summers, W. C. Problems of rural special education--unique or induced? *Breakthrough*, 1975, 3(1), 9-12.

Goldin, G. J. Rural--But not forgotten. *NEA Journal*, 1952, *44*(1), 22-24.

Goldstein, H. *The psychology of exceptional children*. Guilford, CT: Special Learning Center, 1978.

Gorden, R. L. *Interviewing: Strategy, techniques, and tactics* (Rev. ed.). Homewood, IL: Dorsey Press, 1975.

Graham, R. State provisions for cooperative programs in Illinois, Michigan, California, and New York. In F. E. Lord & R. M. Isenberg (Eds.) *Cooperative Programs in Special Education*. Washington, D.C.: Council for Exceptional Children, 1964.

Gutierrez, E. Presentation to Department of Educational Specialties, New Mexico State University, October 1980.

Hampton, N. D. *Effects of special training on the achievement and adjustment of gifted children*. Cedar Fall, IA: State College of Iowa, 1960. (ERIC Document Reproduction Service No. ED 002 871)

________. *Effects of special training on the achievement and adjustment of gifted children. A second report*. Cedar Falls, IA: State College of Iowa, 1961. (ERIC Document Reproduction Service No. ED 002 906)

Han, W. S. Alienation, deviation-proneness and perception of two types of barriers among rural adolescents. *Social Forces*, 1971, *49*(3), 398-413.

Harris, W. J., & Mahar, C. Problems in implementing resource programs in rural schools. *Exceptional Child*, 1975, *42*, 95-99.

Hassinger, E. W. *The rural component of American society*. Danville, IL: Interstate Printers & Publishers, 1978.

Heck, A. O. *The education of exceptional children*. New York: McGraw-Hill, 1940.

Heffernan, H. Meeting the needs of exceptional children in rural schools. *Proceedings of the National Education Association*, 1935, *73*, 486-488.

Helge, D. I. *Report on the national conference providing technical assistance and support to non-urban school systems in implementing mandated comprehensive special education programs*. Murray, KY: Center for Innovation & Development, Murray State University, 1976.

________. *Final project report of the national rural research project*. Murray, KY: Murray State University, Center for Innovation and Development, 1979. (ERIC Document Reproduction Service No. ED 182 085)

________. *A national comparative study regarding rural special education delivery systems before and after passage of PL 94-142*. Murray, KY: Murray State University, Center for Innovation & Development, 1980. (ERIC Document Reproduction Service No. ED 190 292)

________. Staff Development models to serve all children including handicapped. *The Rural Educator*, 1981, *2*(3), 14-23.

Helwig, J. T., & Council, K. A. *SAS user's guide* (1979 ed.). Cary, NC: SAS Institute, 1979.

Heller, H. Rural special education: A dilemma. *Theory into Practice*, 1975, *14*(2), 137-142.

Henderson, G. *National assessment and rural education*. Las Cruces, NM: New Mexico State University, ERIC Clearinghouse on Rural Education and Small Schools, 1973. (ERIC Document Reproduction Service No. ED 085 127)

Hewett, F. M. *Education of exceptional learners*. Boston: Allyn & & Bacon, Inc., 1974.

Hoffman, E. The American public school and the deviant child: The origins of their involvement. *Journal of Special Education*, 1975. *9*(4), 415-421.

Hofmeister, A. M., & Atkinson, C. A. *The telepac project: A service delivery model for the severely handicapped in rural areas*. Logan, UT: Utah State University, 1975. (ERIC Document Reproduction Service No. ED 114 237)

Hoover, T. Rural program for emotionally handicapped students. *Teaching Exceptional Children*, 1978, 10, 30-32.

Horn, J. K. *A study of teacher competencies for special education*. Unpublished master's thesis, University of New Mexico, 1971.

Hughes, L., & Spence, D. *Attitudes and orientations of rural groups and effects on educational decision-making and innovation in rural school districts*. Las Cruces, NM: New Mexico State University, ERIC Clearinghouse on Rural Education and Small Schools, 1973. (ERIC Document Reproduction Service No. ED 085 127)

Hull, R. *The small secondary schools: Mechanisms for making less do more*. Eugene, OR: Eugene College of Education, 1980. (ERIC Document Reproduction Service No. ED 186 171)

Hutinger, P., Kutcher, A., Smith-Dickson, B., & Hanners, B. What's rural? An overview of successful strategies also by rural programs for young handicapped children. *A Rural Network Monogram*, June 1981.

Hyman, H. *Survey design and analysis*. New York: Free Press, 1955.

Isenberg, R. M. Administrative organization. In J. Jordan (Ed.) *Special Education Services in Sparsely Populated Areas--Guidelines for Research*. A report of the National Conference on Special Education Services in Sparsely Populated Areas, Denver, March, 1966. (ERIC Document Reproduction Service No. ED 012 627)

________. *Education in rural America - Are we doing the job*? Paper presented at the National Outlook Conference on Rural Youth, Washington, D.C., October 1967. (ERIC Document Reproduction Service No. ED 014 342)

________. Various approaches to developing area programs. In C. H. Meisgeier & J. D. King (Eds.) *The Process of Special Education Administration*. Scranton, PA: Intext, 1970.

Issac, S., & Michael, W. B. Handbook in research evaluation. San Diego, CA: Robert R. Knapp, Publisher, 1971.

Iwatomo, D. What about the small high school? Education Digest, 1963, 29, 22-24.

Jacobsmeyer, D. J. (Ed.) Rural education initiative: A report on the regional rural roundtables. Washington, D.C.: U.S. Office of Education, 1980.

Jongeward, R. F. Involving rural people in rural education. Paper presented at the annual meeting of the Rural Sociological Society, Montreal, Canada, 1974. (ERIC Document Reproduction Service No. ED 093 558)

Jordan, J. Notes and working papers concerning the administration of of programs authorized under Title VI of Public Law 89-10, ESEA Act, as amended - Education of handicapped children. (Prepared for the Subcommittee on Education, May 1968.) Washington, D.C.: U.S. Government Printing Office, 1969.

Kahn, R. L., & Cannell, C. F. The dynamics of interviewing. New York: John Wiley & Sons, 1965.

Kauffman, J. M., & Hallahan, D. P. (Eds.). Handbook of special education. Englewood Cliffs, NJ: Prentice-Hall, Inc., 1981.

Kaye, I. Where do the poor reside? An analysis of the Bureau of Census current report on poverty status. Paper presented at second National Conference on Rural America, Oct. 7, 1976.

Keogh, B., Lyon, M., Levitt, M., McGinity, A., Palmer, D., Robertson, D., Rosenberg, P., & Stiehl, J. Special education in rural areas of California. (Tech. Rep. SERP 1974-AL)

Klees, S., & Jess, J. D. (Eds.) Survival in the 80s: People united for rural education conference report, 1980. Alden, IA: People United for Rural Education, 1980. (ERIC Document Reproduction Service No. ED 192 967)

Krathwohl, D. R. How to prepare a research proposal (2nd ed.). Syracuse, NY: Syracuse University Press, 1977.

Kuvlesky, W. Ethnic group identity and occupational status projections of teenage boys and girls: Mexican American, Black, Native American, and Anglo youth. Dallas, TX: Paper presented to the Southwestern Sociological Association Annual Meeting, April 1976. (ERIC Document Reproduction Service No. ED 134 371)

Landon, S., & Sandoval, A. Children becoming casualties in battle over state special ed. Albuquerque Journal, April 19, 1981, pp. A-1; A-6.

Latham, G. Serving the rural handicapped: Multiple methods. The Rural Educator, 1981, 2(3), 25-30.

Laws of the State of New Mexico, 1947. Santa Fe, NM: Quality Press, 1947.

Laws of the State of New Mexico, 1972. Albuquerque, NM: Case Thomas, 1972.

Layman, E. M. A comparison of the effectiveness of rural and graded school systems in meeting the needs of mentally retarded children. American Journal of Mental Deficiency, 1940, 45(1), 89-96.

Lehman, P. E. Teacher training takes to the road. University Park, PA: Pennsylvania State University, 1971. (ERIC Document Reproduction Service No. ED 054 063)

Loveless, J. E. Supplementing the programs and services of rural school systems by new type regional service agencies, 1967. (ERIC Document Reproduction Service No. ED 016 550)

MacMillan, D. L. Mental retardation in school and society. Boston: Little, Brown, 1977.

Mann, L., & Sabatino, D. The third review of special education. New York: Grune & Stratton, 1976.

Martens, E. H. Education of exceptional children. U.S. Office of Education Bulletin, 1931, 20, 38-416.

________. Provisions for exceptional children. U.S. Office of Education Bulletin, 1937, 2, 66-70.

________. State supervisory programs for the education of exceptional children. U.S. Office of Education Bulletin, 1940, 6(10), 1-92.

McClurkin, W. D. Rural education in the United States. Las Cruces, NM: New Mexico State University, ERIC Clearinghouse on Rural Education and Small Schools, 1970. (ERIC Document Reproduction Service No. ED 043 408)

McKenzie, H. S., Egnar, A., Knight, M., Perelman, P., Schneider, B., & Garvin, J. Training consulting teachers to assist elementary teachers in the management and education of handicapped children. Exceptional Children, 1970, 37, 137-143.

________, Hill, M. G., Sousie, S. P., York, R., Baker, K. Special education training to facilitate rural, community-based programs for the severely handicapped. In E. Santang, (Ed.) Educational Programming for the Severely and Profoundly Handicapped. Reston, VA: Council for Exceptional Children, 1977.

Melcher, J. W., & Blessing, K. P. Special education for rural retarded youth. *Exceptional children*, 1957, *23*(5), 207-210.

Midkiff, J. *ESEA Title I and rural Alaska*. Juneau, AK: Alaska State Department of Education, 1969. (ERIC Document Reproduction Service No. ED 036 353)

Moe, E. O., & Tamblyn, L. F. *Rural schools as a mechanism for rural development*. Las Cruces, NM: New Mexico State University, ERIC Clearinghouse on rural education and small schools, 1974. (ERIC Document Reproduction Service No. ED 093 507)

Montoya, G. G. *A survey in New Mexico of the in-service training needs of special education teachers and the principals' perceptions of the needs of the special education teachers they supervised and how both groups want these services delivered*. Unpublished doctoral dissertation, University of New Mexico, 1977.

Morris, G. Helping the mentally superior child in rural areas. *Exceptional Children*, 1956, *22*(4), 161-162; 174.

Morrisett, L. N. How can we solve the problems of administration in the small high school? *National Association of Secondary School Principals Bulletin*, 1950, *24*, 89-99.

Morrisey, P. A. *PL 94-142: Rural education for the handicapped*. Washington, D.C.: Division of Innovation and Development, Bureau of Education for the Handicapped, 1976.

Murfeesboro City Schools. *Classroom on wheels*. Murfeesboro, TN: Murfeesboro City Schools, 1973. (ERIC Document Reproduction Service No. ED 085 057)

Muse, I. D. *Preservice programs for educational personnel going into rural schools*. Washington, D.C.: National Institute of Education, 1977. (ERIC Document Reproduction Service No. ED 135 506)

________. Training teachers for rural areas. *Compact*, 1980, *14*, 6-7.

________, Parsons, R. J., & Hoppe, E. M. *A study of rural teachers and the rural schools as perceived by school administrators, teachers, parents and students*. Salt Lake City, UT: Brigham Young University, 1975. (ERIC Document Reproduction Service No. ED 119 921)

________, & Stonehocker, L. *A study of small rural high schools of less than 200 students: Perceptions of teachers and administrators*. Paper presented at the Annual Meeting of the American Education Research Association, April 8-12, 1979, San Francisco, CA. (ERIC Document Reproduction Service No. ED 168 778)

Nachtigal, P. A. *Improving rural schools*. (National Institute of Education, U.S. Department of Education) Washington, D.C.: U.S. Government Printing Office, September 1980.

Nanninga, S. P. *The New Mexico school system*. Albuquerque, NM: University of New Mexico Press, 1942.

National Advisory Council on the Education of Disadvantaged Children. *Special report on rural education*. (Health Education and Welfare Department) Washington, D.C.: U.S. Government Printing Office, 1978.

New Mexico Department of Education. *New Mexico school district profile 1978-79 school year*. Santa Fe, NM, 1980.

New Mexico statutes, 1941 annotated. Indianapolis: Bobbs-Merrill, 1942.

O'Fallon, O. K., & Doak, E. E. (Eds.) *Proceedings: Small schools invitational conference, February 1974*. Knoxville, TN: Tennessee University. (ERIC Document Reproduction Service No. ED 087 595)

Office of Rural Development. *Getting human services to rural people--Final Report*. Washington, D.C.: Office of Rural Development, Department of Health Education & Welfare, 1976.

Otto, H. J. *Elementary school organization and administration*. New York: D. Appleton-Century, 1934.

________. Utilizing teachers' special talents in small schools. *Education Administration and Supervision*, 1937, *23*, 35-42.

Pankratz, R. Teacher education today: A case for the rural minority. *Journal of Teacher Education*, 1975, *26*, 107-108.

Parker, R. K. *The effectiveness of special programs for rural isolated four-year-old children: Wakulla County preschool*. Atlanta, GA: Southeastern Education Laboratory, 1970. (ERIC Document Reproduction Service No. ED 056 743)

Permanent organization regarding rural special education founded. *NRP Newsletter*, 1981, *2*(3), 8.

Phillips, B. S. *Social research: Strategy and tactics.* (2nd ed.) New York: MacMillan, 1971.

Porter, R. B. Clinical service extensions for rural exceptional children. *Exceptional Children*, 1953, *20*, 105-110.

Progress toward a free appropriate education: A report to the Congress on the implementation of Public Law 94-142. Washington, D.C.: U.S. Department of Health, Education, and Welfare, Office of Education, January 1979.

Prominent organization regarding rural special education founded. *NRP Newsletter*, 1981, *2*(3), 8.

Reutter, E. E., & Hamilton, R. R. The law of public education (2nd ed.). New York: Foundation Press, 1976.

Reynolds, M. C., & Birch, J. W. Teaching exceptional children in all America's schools. Reston, VA: Council for Exceptional Children, 1977.

Richardson, S. A., Dobrenwend, B. S., & Klein, D. Interviewing: Its forms and functioning. New York: Basic Books, 1965.

Sarason, S., & Doris, J. Educational handicap, public policy and social history. London: The Free Press, 1979.

Sax, G. Empirical foundations of education research. Englewood Cliffs, NJ: Prentice-Hall, 1968.

Schrag, J., Fargo, L. S., & Walker, L. Education of handicapped children in rural areas. Paper presented at the Rural Education Seminar, College Park, Maryland, May 1979. (ERIC Document Reproduction Service No. ED 172 982)

Searls, L. G. Innovative programs in western New York state. Buffalo, NY: State University of New York, 1967. (ERIC Document Reproduction Service No. ED 021 020)

Sears, P. M., & Truske, T. N. A legislative program to improve New Mexico public schools: A report to the State Department of Finance and Administration. Santa Fe, NM: State Department of Finance and Administration, 1970.

Seidel, H. E. Attitudes, goals, achievements, and educational needs of adolescents from two Appalachian communities. The Journal of Educational Research, 1970, 63(9), 424-429.

Sellitz, C., Wrightsman, L. S., & Cook, S. W. Research methods in social relations. New York: Holt, Rinehart and Winston, 1976.

Sher, J. P. Education in rural America: A reassessment in conventional wisdom. Boulder, CO: Westview Press, 1977.

________. Revitalizing rural education: A legislator's handbook. Washington, D.C.: National Conference of State Legislatures, 1978a. (ERIC Document Reproduction Service No. ED 168 750)

________. A proposal to end federal neglect of rural schools. Phi Delta Kappan, 1978b, 60, 280-282.

________. Education in sparsely-populated areas of developed nations. Education Forum, 1978c, 43, 83-88.

________, & Rosenfeld, S. A. Public education in sparsely populated areas of the United States. Washington, D.C.: National Institute of Education, 1977. (ERIC Document Reproduction Service No. ED 141 006)

Sholty, M. The eduction of exceptional children in a rural state. *Proceedings of the National Education Association*, 1935, *73*, 496-497.

Small districts, large increases. *Education of the Handicapped*, June 20, 1979, *5*(13), 3.

Smith, J., & Pasternack, R. Cooperative education services in remote and sparsely populated areas. In Sontang, E. (Ed.) *Educational Programming for the Severely and Profoundly Handicapped*. Reston, VA: Council for Exceptional Children, 1977.

Smith, M. Tier counties and delinquency in Kansas. *Rural Sociology*, 1937, *2*, 310-322.

Smith, R. M. *The comprehensive education program for West Virginia*. Charleston, WV: West Virginia State Department of Education, 1964. (ERIC Document Reproduction Service No. ED 019 163)

Solenberger, E. R. Public school classes for crippled children. *U.S. Office of Education Bulletin*, 1918, *10*, 1-52.

Spayer, M. S. *The school counselor's perceived role and projected role in the total education of exceptional students*. Unpublished educational specialist's thesis, New Mexico State University, 1973.

Special education in rural areas: The problems...some solutions. *Rural Education Mini Review*. Las Cruces, NM: ERIC Clearinghouse on Rural Education and Small Schools, 1980.

State of New Mexico annual statistical report of the superintendent of public instruction: For the period July 1, 1965 to June 30, 1966. Santa Fe, NM: State Education Department, 1966.

State of New Mexico annual statistical report of the superintendent of public instruction: For the period July 1, 1970 to June 30, 1971. Santa Fe, NM: State Education Department, 1971.

State of New Mexico 13th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1935.

State of New Mexico 14th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1937.

State of New Mexico 15th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1939.

State of New Mexico 16th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1941.

State of New Mexico 17th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1943.

State of New Mexico 18th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1945.

State of New Mexico 19th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1947.

State of New Mexico 20th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1949.

State of New Mexico 21st biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1951.

State of New Mexico 22nd biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1953.

State of New Mexico 23rd biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1955.

State of New Mexico 24th biennial report of the state superintendent of public instruction. Santa Fe, NM: State Department of Education, 1957.

Stile, S. Improving the quality of special education in rural areas: The College of Education contributions. The Interstate Compact for Education, 1980, 14(3), 24-26.

Sturges, A. W. The small school: A rediscovered resource in American education. Paper presented at the 79th Annual Meeting of the North Central Association of Colleges and Secondary Schools, Chicago, Illinois, March 1974. (ERIC Document Reproduction Service No. ED 088 622)

Tamblyn, L. R. Inequality: A portrait of rural America. Washington, D.C.: Rural Education Association, 1973a. (ERIC Document Reproduction Service No. ED 073 878)

________. Rural education in the United States. Washington, D.C.: Rural Education Association, 1973b.

Tate, M. W. Statistics in education. New York: MacMillan, 1955.

Thompson, P. E. A study of the educational opportunities offered handicapped children by the public schools in New Mexico. Unpublished master's thesis, University of New Mexico, 1956.

Thornton, S. M. A preschool on wheels for isolated tots. The National Observer, November 15, 1975, p. 6.

Truesdell, W. P. The dilemma facing the small school, 1969. (ERIC Document Reproduction Service No. ED 037 290)

Tweeten, L. Education has role in rural development. Rural Development Perspectives, October 1980, pp. 9-13.

Urban, S. Special education in rural areas: An unsolved problem. Las Cruces, NM: ERIC Clearinghouse on Rural Education and Small Schools, 1972. (ERIC Document Reproduction Service No. ED 128 979)

Van Sickle, J. H., Witmer, L., & Ayres, I. P. Provision for exceptional children in public schools. U.S. Bureau of Education Bulletin, 1911, 14, 1-92.

Vasa, S. F., & Steckelberg, A. L. Programming for mildly handicapped students in rural schools. The Rural Educator, 1981, 2(3), 31-37.

Vergason, G. A. Application of accountability to special education in rural areas. Reston, VA: Council for Exceptional Children, 1971. (ERIC Document Reproduction Service No. ED 057 508)

Veselak, J. L. The delivery of educational services: The small district problem. A review of the literature. Paper presented to the faculty of the Department of Educational Administration, University of Texas at Austin, February 1980. (ERIC Document Reproduction Service No. ED 193 002)

Wait, W. T. Emotional training in the rural school. Proceedings of the National Education Association, 1935, 73, 493-495.

Wallin, J. E. Training of the severely retarded, viewed in historical perspective. Journal of Education, 1968, 151(1), 73-93.

Warwick, D. P., & Lininger, C. A. The sample survey: Theory and practice. New York: McGraw-Hill, 1975.

Weatherman, R., & Hollingsworth, S. (Eds.) Administration of special education for rural and sparsely populated areas. St. Paul: University of Minnesota Press, 1975. (ERIC Document Reproduction Service No. ED 117 807)

Weeks, R. Problems in rural schools. Washington, D.C.: Office of Education, 1972. (ERIC Document Reproduction Service No. ED 077 603)

Wilken, W. H., & Porter, D. O. State aid for special education: Who benefits? (National Institute of Education, Department of Health, Education, and Welfare). Washington, D.C.: U.S. Government Printing Office, 1977.

Williams, H. M. Planning for the rural mentally handicapped child. American Journal of Mental Deficiency, 1948, 11(4), 282-289.

Wilson, L. A. Organization and administration of special education in the public schools. Journal of Educational Sociology, 1932-33, 6, 371-377.

DEAN'S GRANT PROJECTS AND RURAL EDUCATION

Maynard C. Reynolds
University of Minnesota

Prepared for

Special Education in Rural America, a project supported by Research Contract No. 400-81-0017 from the National Institute of Education to the Department of Special Education, The University of Kansas.

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

Written April 6, 1983

Dean's Grant Projects and Rural Education

Maynard C. Reynolds

University of Minnesota

The full range of special education and related services is very difficult to provide in rural schools. Although children with special needs do indeed live and attend school in rural areas, it is hard to imagine that the schools, which usually are isolated and smaller than those in suburban or urban areas, have the resources to employ all the learning disability instructors, teachers of the mentally retarded, speech-language consultants, school psychologists, and other specialists who, in the views of some educators, are needed by such children. Through "intermediate units," "boards of cooperative services" or other forms of interdistrict coordination, rural regions are able very often to employ many specialists. Nevertheless, it is difficult and unusual for a given rural school to have on its staff any large number of special educators and other support personnel. Thus there is a special urgency for regular classroom teachers and administrators in rural schools to be willing and able to serve exceptional children, with or without the immediate assistance of specialists. How can regular education personnel be prepared to perform such roles? The answer forms the substance of this chapter and includes a summary of the development, achievements, and possible futures of Dean's Grant Projects.

The Dean's Grant Projects

In 1974, one year before the passage of Public Law 94-142, Dr. Edwin Martin, then Director of the Bureau of Education for the Handicapped, U.S. Office of Education,[1] announced a competition for what came to be called Dean's Grant Projects (DGPs). Only deans or directors of teacher education at institutions of higher education (IHEs) were eligible to apply for the grants. Martin described the purpose and nature of the projects in a letter to all IHEs that made the following points:

> . The development of instructional competencies pertaining to the education of handicapped students for regular education personnel, including elementary educators, secondary educators, principals, supervisors, superintendents, career/vocational educators, and other personnel....
>
> . The reforming of training sequences and curricula which promote the infusion of the competencies in response to the individual challenges of children, including the handicapped, who require additional attention.
>
> . The establishment of projects which incorporate the following programmatic elements:
>
> 1 - Dean or equivalent administrator as the project director.
>
> 2 - A plan which proposes the revision of the teacher education program; modification should be beyond the mere addition of one or two courses.
>
> 3 - Evidence of strong special education faculty involvement and commitment.
>
> 4 - An initial three year timeline for program implementation.

---

[1] The comparable unit as of 1983 is Special Education Programs, U.S. Department of Education.

5 - A delineation of project outcomes including but not limited to: Changes in curricula, impact upon School/College operation, benefits to program graduates, and projected impact upon handicapped and other children whom the program's graduates will serve. (Martin, 1974)

The first set of DGPs was just getting started in 1975 when The Education for All Handicapped Children Act (Public Law 94-142) was passed by the Congress and signed by then-President Gerald R. Ford. Of the several major principles incorporated in this very important law, the most salient to the present review is that of the "least restrictive environment." The meaning of this principle is that whenever possible the handicapped child should be placed in the regular class and that whatever special education and related services are required should be delivered there. Alternatively, it means that a child should not be removed from his own home or ordinary school environment to receive special education and related services unless it can be established that the placement is essential to the child's progress; then the special placement should be limited to a specific period of time and should provide a program planned to achieve specific goals and objectives that are set by a team made up of educators who know the child and the child's parents.

In 1962, 68% of the 4.2 million children identified as handicapped in the nation's schools spent at least some portion of the school day in regular classrooms; an additional 25% attended special classes conducted in regular school buildings (U. S. Department of Education, 1982). These data illustrate the most recent stages of a trend toward the greater inclusion of children with handicaps in regular school settings, a trend which has been given strong and continued support by Public Law 94-142; this means that more and more regular teachers in both urban and rural schools are required to be oriented to the needs of handicapped pupils.

The Challenge to Teacher Education

In the seven years since the beginning of the Dean's Grant program, it has become increasingly apparent that a fundamental restructuring of the schools and teacher-preparation programs is necessary if students with special needs are to be accommodated in the mainstream. The increasing rates at which children were being extruded from regular classes in the 1950s and 1960s were disquieting. In one state it was reported in 1982 that 52 percent of the total school population was enrolled in special education or in some other kind of "pull out" or separate "categorical" school program for at least a part of each school day.[2] Such separations often require stigmatizing labels that are based on unreliable classifications and frequently lead to extreme imbalances between racial and economic groups. Scriven (1983) described the diagnostic procedures of special education as "scandalous," and Howsam (1983) commented as follows on the instruction provided:

> There is every reason to believe that schools were not designed to handle the whole range of educational problems in regular classrooms, even when special services are added. In consequence, both regular students and those with handicapping conditions lose out. Role load and stress problems are introduced. At the same time the public is given more legitimate reasons for "raging" at their institutions or defecting from the system....Effective schools demand strong teachers working in situations where the conditions for learning and teaching are favorable. Our school systems have never come close to meeting such conditions.....
> (Howsam, 1983)

The Dean's Grant program, consequently, is facing a set of fundamental problems in teacher education. Just adding a course or a few lectures by the special education faculty to the existing teacher-preparation sequences is not sufficient. Dr. Thomas Behrens, who served as project officer for the Dean's Grant Projects during their first five years, reported on the early communications from projects as follows:

---

[2] Reported orally in the conference of the Council for Exceptional Children in Spring 1982, by an official of the State Dept. of Education of New Jersey.

> Most of the feedback that BEH received during the first two years was enthusiastic. However, each project reported that to bring about the needed change--to reconceptualize the teacher-preparation curriculum as one in which the learning needs of handicapped children are an integral part--is a much more difficult and far-reaching undertaking than originally was conceived.... When a Dean's Grant Project has gotten off the ground, the dean, faculty, and students realize that the project can bring about a long overdue change in our total educational system. Thus the original modest goal of the Dean's Grant Projects has become a large one--institutional change. (Behrens & Grosenick, 1978, pp. 3-4)

The problem comes down to delivering on a basic commitment of education to all children, and to creating school environments that are genuinely helpful to children, including even those with the most exceptional needs.

Project Purpose and Demographics

The Dean's Grant Projects were unusual in several respects: they focused on faculty development and curriculum change in teacher preparation programs and not on increasing the number of graduates or particular categories of students. The grants went to deans of education or other chief administrative officers in charge of teacher preparation in colleges or universities. The idea was to challenge and support teacher education at its top or most general level and to give broad discretionary power in the use of grants. It was assumed that deans of education were or could become the leaders in their institutions to work for curricular change. The awards, however, were relatively small; they averaged about $40,000 a year.

Through Spring 1982, a total of 260 IHEs were awarded funds for Dean's Grant Projects. The number of DGPs that were in operation each year is as follows:

	N[3]
1975-76	60
1976-77	75
1977-78	92
1978-79	117
1979-80	141
1980-81	132
1981-82	127

These 260 institutions that have received grants are estimated to produce about 40 percent of the nation's teachers.[4] See Appendix A for a list of all institutions having DGPs for the period 1975-1983.

Dean's Grant Projects do not always try to revise all teacher-preparation curricula in the institutions with grants. The areas of study most often focused on, in order of frequency, are as follows:

---

[3] DGPs are on-going. In 1982-83, 105 projects are operating and in early 1983 applications for 1983-84 and beyond will be judged.

[4] Estimated by aggregating the number of graduates recommended for teacher certification by all institutions having DGPs in ratio to the total numbers of new teacher-education graduates in the nation, as reported by the National Center for Education Statistics. The last year for which information was provided for individual institutions was 1973-74. Thus the percentages given are estimates.

	Percentage of Frequency[5]
Elementary Education	95
Secondary Education	92
Administration	42
Counseling	26
Supervision	23
Others	25

A special study of the DGPs operating in 1979-80 showed that most (80%) were operating in public IHEs, weighted somewhat toward urban locations; about one-in-five (20.3%) were located in rural areas. About one-fourth (23.4%) of the IHEs awarded DGPs enrolled fewer than 5,000 students, although the average was more than 10,000 students (Gazvoda, 1980). It appears that these characteristics do not differentiate IHEs generally. Although initially no special attention was given to the needs of rural areas, some of the present consortia of regional IHEs (discussed in a subsequent section) are putting increased emphasis on the needs of schools in rural areas.

Project Operations

Dean's Grant Projects always include two strong emphases: (a) to make the teacher-education faculty aware of the legal mandates and social policies relating to the education of handicapped students and to the consequent changes in the schools, and (b) to change the curriculum in teacher preparation programs to reflect the new mandates and policies.

---

[5] DGPs often focused on more than one area, thus the percentages add up to more than 100.

The procedures adopted by the institutions usually take a variety of forms, even within one institution; and the diversity of approaches across institutions is even greater. For example, faculty awareness activities have often included readings, lectures, seminars, exchange visits with other IHEs, attendance at special conferences, time off for special studies, and retreats that are as individual as the IHEs arranging them. A particularly promising activity for building faculty awareness has been to involve the members in school situations, such as "shadowing" handicapped students for one day. A number of projects have used Hall's (1974) Concerns-Based Adoption Model (CBAM) to assess faculty concerns and awareness in order to plan and evaluate awareness-building activities. CBAM stresses that awareness is not a one-time, one-level phenomenon but, rather, a personal and complex developmental process.

To bring about curricular changes, the following activities are common:

- Development of a course on exceptional children and youth which is required of all teacher-education students. Sometimes more than one new course is required.
- Existing courses are examined and then revised to include components relating to handicapped students. Very often, this process follows a faculty study of needed competencies. Sometimes existing courses are changed by adding or substituting specific modules to cover selected areas. The modules may be purchased by local faculty members from commercial sources or at-cost from another DGP.

- Total teacher-preparation programs are re-examined and revised to add or improve coordination across foundations courses, professional studies, and practicums. Usually, this kind of broad approach develops only after preliminary activities of lesser scope have been completed. The "first steps" are taken most often in the elementary education program, followed by revisions in secondary education and special teaching fields.
- Attention is given to the development and use of practicum stations in schools that exemplify as fully as possible the kinds of situations and challenges which can be anticipated in regular classrooms under Public Law 94-142.

Nearly all projects have found themselves following a pattern of movement from emphasis on faculty awareness and development to curricular development to, finally, adoption, evaluation, and monitoring. Many terms are used to describe this pattern of change, for example, "from planning to adoption," "from attitudes to action," and "from theory to practice."

For almost all IHEs, having a Dean's Grant has led to increased interaction with professional organizations, such as the American Association of Colleges for Teacher Education (AACTE),[6] the National Alliance of Black School Educators (NABSE), and/or various state-level task forces and commissions on professional standards and guidelines for teachers. These groups often have had their own special projects relating to mainstream teacher education and have cooperated with DGPs to expand their resources

---

[6] The Association has had grants from BEH/OSE for work at both state and national levels.

BEST COPY AVAILABLE

and leadership. Many DGPs have served as co-sponsors with state-level ACTE units at conferences and other activities relating to Public Law 94-142.

At the national level, the National Support Systems Project (NSSP)[7] engaged in a large number of collaborative projects with the AACTE and other national groups. For example, the NSSP helped to conduct orientation sessions and provide background materials for state leaders of AACTE affiliate groups. In addition, NSSP held many meetings with state departments of education on such topics as certification and accreditation standards; and with the National Alliance of Black School Educators, the Elementary School Principals Association, and other organizations. A specific form of collaboration between NSSP and some national organizations has been in the joint issuance of publications, especially in cooperation with AACTE and The Council for Exceptional Children (CEC).

Other frequently listed activities or "spin-offs" in DGP operations include the following:

- Greater cooperation among departments of the college participating in teacher education, especially between general education and special education faculties.
- Improvement of professional resources (library, resource center, etc.) for faculty members, especially on topics relating to the mainstreaming of handicapped students.

---

[7] The NSSP served as the technical assistance system for the entire national network of DGPs from 1975 to 1982. It also operated a regional system under the leadership of eight deans or former deans of education. A broad spectrum of publications, conferences, and consultation activities resulted from NSSP operations. The NSSP ceased existing in September 1982.

- Adoption of more systematic approaches to problems of change and development in teacher preparation.
- Improved governance systems for teacher education in the colleges. In some cases colleges have found their decision-making processes to be inadequate for major decisions, such as those prompted by Public Law 94-142, and the DGP has helped to promote necessary change.
- Stronger professional leadership role taken by deans (or department heads).
- More sharing with other colleges through both formal and informal networks to improve teacher education, especially at the state level.
- More directed use of sabbaticals and other development procedures among faculty members.
- Better coordination between faculties in foundations of education and professional studies in teacher education.
- Improved basis for participation in rapidly developing inservice education programs for taechers.
- Faculty research and writing activities increased in areas of concern in DGPs.
- Participation in international activities on the topics of "integration" or "mainstreaming" of handicapped students and implications for teacher education.

BEST COPY AVAILABLE

A Common Body of Practice for Teachers: An Idea for the Future

Each Dean's Grant Project has had to find its way into curriculum changes by taking account of its history, current status, and resources. Early in the Dean's Grant program, however, an attempt was made under the leadership of the NSSP staff to try to discover the frequent or common elements of curriculum change that were occurring. Five representatives[8] of DGPs met and drafted a statement on the recurring themes in project-directed curriculum changes. This draft was discussed in detail at several national and regional meetings of DGP staff members and then published under the title, A Common Body of Practice for Teachers: The Challenge of Public Law 94-142 to Teacher Education.[9]

The main feature of the paper was the specification of 10 "clusters of capability" for teachers; they were the topics getting the most attention in the curriculum changes initiated by DGPs. The 10 areas, along with the percentages of DGPs indicating (in Spring 1980) that these were foci of attention in their efforts for curriculum revision (Gazvoda, 1980), follow:

---

[8] Jack Birch, Dawn Grohs, Robert Howsam, Catherine Morsink, and Maynard Reynolds. They also drafted the first version of "A Common Body of Practice."

[9] Distributed since 1979 by the American Association of Colleges for Teacher Education.

BEST COPY AVAILABLE

Clusters of Capability	Percentages of DGPs working in area and/or wanting help
Curriculum - a broad orientation to curriculum and how to modify it for individuals	76.8
Teaching basic skills - all teachers need preparation to teach the literacy skills plus basic life maintenance and personal development skills	70.0
Consultation - using consultation in studying individual children and designing alternative educational programs	74.8
Parent-school relationships - understanding families and skill in communicating with parents, with emphasis on minority group families	74.1
Class management - skill in maintaining attention, order, and "favorable climate" in the classroom	82.0
Individualized teaching - including diagnostic procedures and systematic approaches to individualized instruction	82.0
Exceptional conditions - basic knowledge of exceptional conditions and classroom procedures for accommodation; includes orientation to collaborative work with specialists	89.7
Referral and observation - procedures and obligations for using specialized resources	84.7
Student-student relationships - helping nonhandicapped children to understand and accept handicapped classmates	78.0
Legal requirements and professional values - training in due process requirements, orientation to related ethical issues	87.8

(Gazvoda, 1980)

It is clear that these 10 "clusters of capability" are a useful summary of the curriculum needed for teacher education under Public Law 94-142. Furthermore, it would be redundant for institutions to totally rework or re-invent these findings. The clusters provide at least an outline of the curricular "journey" undertaken by most DGPs. It was in this framework that another step was taken by the NSSP: support for the development of knowledge-based reviews of some 27 topics subsumed by the "clusters." The sub-topics were decided upon through a modified Delphi procedure in which DGP staff members helped to define the particular topics for which knowledge-based reviews would be useful in their faculty development and curriculum change activities. At the time of this writing, 23 "resource units" or knowledge-base reviews are available; an additional four will be completed soon.[10]

Each resource unit consists of a list of "reasonable objectives" for teacher-education programs in the topical area, a self-assessment procedure which can be completed individually or in groups by teacher educators, a rating system for present training programs, a 25-50 page review of the relevant base of knowledge and professional practice, hypothetical school situations which can be used to check understanding, a list of instructional aids and activities, a brief bibliography, and a final section that includes reprints of several major articles on the subject of the unit. The largest part of each unit is the review of the knowledge base, which includes main definitional elements and a summary of the well-established principles (for teachers) in the area. In areas in which the gap between the knowledge base and the training of teachers in specific skills is considerable, the resource units also present methods for teaching those skills to prospective teachers. After it was drafted, each unit was appraised by persons who are also knowledgeable in that area and then returned to the primary author for final revision.

---

[10] For the list of resource units see Appendix B to this paper. All units are distributed by AACTE (Suite 610, One Dupont Circle, Washington, DC 20036).

The resource units are intended strictly for use by teacher educators. They are neither textbooks nor instructional modules; rather, they are a means of communication among teacher educators about the "state of the art" in areas relating to specific responsibilities of today's teachers. The material is designed to be used by an individual (completing the self-assessment test and/or reading through the unit on classroom management for the content or the recent literature on the topic) or a group (reviewing the contents of a teacher-education program curriculum). Like the clusters of capability from which the resource units derive, the modules are not intended to dictate the curricula of teacher-education programs. Rather, their purpose is to encourage teacher educators to recognize the contemporary responsibilities of teachers, to suggest that teacher educators have a role in developing teachers who can meet these responsibilities, and to outline a base of validated knowledge and practice directly related to each area of teacher responsibility.

Obstacles to Change Processes

The Dean's Grant Projects developed during a period when substantial difficulties complicated planning and decision processes in teacher education. Some examples follow:

- Many institutions have experienced significant reductions in financial supports and in the enrollment of students in teacher-education programs; such reductions often arouse insecurities in faculty members and engender conservative attitudes toward program changes.
- Reductions in faculty size sometimes have created heavy teaching schedules and larger college classes, which engender morale and political problems when additional changes are proposed.
- In at least 18 states special testing programs for teachers have been started. These are managed outside the teacher-preparation institutions and are thought, by many observers, to express a lack of confidence in the institutions that prepare teachers (Sandefur, 1982).
- Recent additions of special content (e.g., in human relations, multicultural education, and drug education) to teacher-education programs have crowded the curriculum and made further additions very difficult.

Dean's Grant Projects sometimes produce strains on the college, school, or department of education in such general areas as the following:

- The ability of faculty members to make major decisions on programs: Sometimes the faculty governance system seems adequate for minor but not for major changes, such as those sometimes prompted by the Dean's Grant Project.
- The DGP may be the "straw" that breaks the "camel's back" on issues such as the four-year limit on teacher-education programs.

A majority of the institutions to which DGPs have been awarded report major difficulties because of the time constraints on teacher education, and many report specific actions to deal with the issue at this time.

- Sometimes the DGP leads to changes which could put the college in a disadvantageous position vis-à-vis other IHEs in the state or region (e.g., more course requirements result in extensions of the program and added tuition charges).

What Has Been Learned About Change Processes

Recent projects have learned from earlier DGPs and have tended to make better and faster progress, as shown, for example, in the Survey of Projects conducted by the Teaching Research agency of Oregon (1981). The knowledge acquired by the early projects was communicated to the later projects through special meetings of personnel from "new" project sites and through regular meetings of all DGP staff members at regional and national levels. Ideas passed on to the later projects included the following:

- Use project resources in small amounts to provide supports for many faculty members rather than to support mainly a small project staff.
- Encourage "ownership" and management of the project by the general education faculty, less by the special education faculty.
- Avoid simply "adding a course" and try to make early moves toward broad, integrated approaches to curricular content in existing courses.

- Give early, strong attention to practicum sites and to increasing communications with regular education teachers and principals in field situations.
- Emphasize the leadership given to the project by the dean.
- Keep the dean "up front" and deeply involved in the project; visibility, support and priority of concern should be apparent.
- Avoid the tendency for the project staff to "do the work" of the project; instead, try to do more facilitative kinds of things for the total faculty.
- Give more and earlier emphasis to project evaluation and documentation.
- Plan project evaluation and documentation from the start; collect good baseline data and know where the faculty is at from the beginning.
- Seek opportunities for cooperation with the state department of education and with other teacher-preparation centers in the state and region.
- Be prepared for long-term work with faculty on one-to-one basis; recognize resources which individuals already have;
- Don't try to change faculty members; be prepared to offer them assistance, released time, recognition, and other rewards.
- Work systematically on the project; that is, plan carefully to take account of knowledge about change processes and staff development.
- Work for permanent and broad changes rather than for "pilot" or "parallel" programs that can easily disappear when the federal funds are gone.

BEST COPY AVAILABLE

BEST COPY AVAILABLE

- Develop a broad coordinating committee that includes parents, handicapped persons, and outside educators.
- Use regular faculty members as lead project staff; giving leadership to "soft money" junior-level staff members is a weak procedure.
- Expect to change your original plan.
- Involve all faculty members across departments and be sure to respond to faculty ideas; move beyond the special education faculty as early as possible; use key leaders among the faculty; recognize that attitudes will be different in different departments, for example, between elementary and secondary education.

Dean's Grant Consortia

An important recent innovation among DGPs has been the development of consortia of institutions to pursue programmatic goals. Starting usually from the base of one well-established DGP, a set of related institutions in the same region or with a common bond have joined together to broaden their activities. Sharp (1982) has summarized the experiences of several DGP consortia. See Appendix C for a list of consortia and the institutional members of each consortium.

An example of a consortium operating in a rural area is provided by the University of Nebraska-Lincoln (UN-L) where a DGP had operated successfully for several years under the leadership of Dean Robert Egbert and Professor Donna Aksamit. They invited seven small rural colleges, both private and public, to join the Un-L in its project activities. Each college developed its own plan for needs assessment, faculty development, curriculum development, and evaluation, with technical assistance by Un-L faculty members. Local advisory committees that included faculty members, community representatives, and handicapped persons were organized at each site. Faculty members from the seven colleges were invited to a series of state-level, regional, and national meetings. Materials found useful at the UN-L and in other DGPs were shared fully with the consortium. The life-history of this consortium appears to follow much the same pattern as that of other DGPs, except that a special support system operates at the state level for the consortium members.

The Alabama A & M University DGP, under the leadership of Dean Cordell Wynn,[11] invited four small private colleges in central and north Alabama to join the project. The four are historically black institutions of higher education in which service to rural areas is a major concern. Although their goal was the same as that in DGPs generally, their circumstances were unusual: none had a special education faculty or special education program. The particular objectives of this consortium were to assist professional education faculty members in acquiring a working knowledge of special education mandates, develop needed curriculum revisions in teacher-preparation programs, create a mutually helpful communications network among all five institutions, and to share resources found useful in DGPs. This consortium had the extra advantage of materials and other forms of assistance from the National Technical Assistance Center of Teacher Education in Historically Black Institutions of Higher Education which was sponsored by the National Alliance of Black School Educators.

---

[11] Dr. Wynn has since (1982) become President of Stillman College in Tuscaloosa, Alabama.

BEST COPY AVAILABLE

In general, the consortium approach has been received enthusiastically and is one of the most promising models for future work toward DGP goals. A number of conclusions about operating a DGP consortium have been suggested, including the following (Sharp, 1982): (a) as in any other kind of DGP it is necessary that the approach be individualized for each college or university; (b) it is important that the lead institutions make clear that they are promoting only a temporary system - one with limited objectives and from which institutions can "exit" at any time; (c) involve the full faculty in education, as well as administrators, from each institution as early as possible and certainly before any commitment to join a consortium is made; and (d) the host institution must take plenty of time to get acquainted with the people at the site of each institutional member of the consortium and must try to respond to the unique needs perceived at each site. Observers report that the experience of working through a consortium on one project, as in the case of the Dean's Grant Projects, creates an environment in which the general communications among institutions are improved and opportunities for future collaboration are enhanced. Although it has been noted that in the case of the DGPs it has been important to present the consortium approach as a "temporary system," perhaps possibilities for quite lasting relationships are engendered through "temporary" arrangements. More is to be said of this later.

Influence of the Dean's Grant Projects

A number of evaluative studies have been conducted of and by Dean's Grant Projects (Bates, 1982; Gazvoda, 1980; Hall, 1978, Reynolds, 1982b;

BEST COPY AVAILABLE

Rhoads, 1979; Sivage, Bryson, & Okun, 1982; Teaching Research, 1981). Some have examined the concepts underlying the Dean's Grant program; others have looked at processes of project development, and still others have looked at project outcomes. One set of activities undertaken by Bryson (1982) focused on creating systems for planning, conducting, and evaluating DGPs.

Sivage, Bryson, and Okun (1982) includes reports by the three authors. Sivage and several colleagues, all of whom were then at the University of Oregon, visited 12 DGPs and conducted carefully structured interviews to assess the basic idea of deans as leaders in major curriculum changes. They found that deans were deeply involved in the projects, moreso than might have been expected, and that the "power of their offices" was indeed significant, especially when the DGP operations were linked to larger, long-range planning and change processes at the institutions.

Bryson's work focused on applying a contingency-management model to deal with the political as well as technical difficulties of managing change in a pluralistic organization, such as a college of education. "Contingency management" in this case refers to contingencies in the organizational situation or the specific goals and contextual variables which one must consider in dealing strategically and tactically with a complex change process.

Bryson related his work to theories on how administrative leaders (e.g., deans of education) often cannot directly and precisely control activities in their work environment, but how they can shape what he calls forums (which govern access to communication), arenas (which relate to exercises of power), and courts (which define legitimacy).

BEST COPY AVAILABLE

Included is a set of detailed materials for use by deans in data-based procedures to plan, coordinate, and evaluate their efforts for curriculum change and development.

Okun examined specifically the role of deans of education as change agents and found the idea "wholly endorsed" in the results of Dean's Grant Projects. The strength of a particular dean's specific interest in the DGP and the history of dean's involvements in innovation are factors much influencing the degree of DGP success.

A number of DGP staffs have used Hall's (1974) Concerns-Based Adoption Model to assess the concerns of faculty members with proposed changes in their teacher-education programs. Hall reported his work in trying to help a dean of education to understand the various stages of his faculty's development in connection with a DGP. A conclusion in that case was that the dean had been remarkably successful in creating "awarenesses" about needed curriculum changes but would need to find a way of "shooting the gun" as the "starter" for the next phase of development (Hall, 1978). The CBAM model provides a useful set of tools and theories in systematic efforts for change. In addition to developmental measures of "concerns," the model also provides an approach to measuring the actual use or adoption of an innovation.

The Gazvoda survey of all projects in Spring 1980, which focused on project results, showed the following achievements for projects in their fourth and fifth years of operation:

BEST COPY AVAILABLE

	Percent having made significant or complete changes
Curriculum changes	72
Faculty knowledge re P.L. 94-142	87
Student knowledge re P.L. 94-142	88
Broad program changes accomplished	58
Practicums revised	42

Source: Gazvoda, 1980.

Although these data reflect self-evaluations that always have limitations, they are fully in accord with other data, for example, those collected by Teaching Research (1981). They show that progress in DGPs is by no means an "overnight matter" but that after about four years of work, 90 percent of institutions report very good progress in the development of faculty awareness and commitment and in making curriculum changes. Very often, the work of a DGP reveals the need for basic program restructuring and that has been accomplished less often - in 58 percent of the cases in Gazvoda's survey. Even less often (42 percent) have DGPs been successful in revising their practicum arrangements. The problem about practicums is serious and has been noted, for example, by Sontag (1982):

> None of the former Dean's Grant Projects in a national survey (Teaching Research, 1981) reported the use of practicum and student teaching with handicapped students to complement revised coursework offerings, and less than 30% of the final reports submitted to SEP by Dean's Grant recipients indicate revisions in practicum experiences. It seems to me that there should be increased efforts to reinforce coursework with relevant practica experiences. (p. 70)

The "bottom line" in evaluation of Dean's Grant Projects, of course, is the impact they have in improving education for handicapped students in regular classes. A long chain or organically linked events is involved in achieving such impact, beginning with awareness of needs by teacher education faculty, then moving to curriculum planning and implementation in programs for teacher preparation, then on to employment in schools of teachers who have the revised preparation, the implementation of new practices by the new teachers and, finally, the measurement of the impact of the new practices on the lives of the pupils of these teachers. The strongest forms of evaluation would involve comparisons of gains by such pupils with those made by teachers in a control group. Nothing quite like evaluations of this kind have been performed.

Probably the most complete evaluation so far completed was done at the University of Kansas by Hohn and Brownlee (1982). The teacher education faculty at the University of Kansas had worked for several years on designing and implementing a teacher education curriculum which took into account the implications of Public Law 94-142. In fact the Kansas curriculum was reasonably consistent with the "competency clusters" idea outlined earlier in this paper. Forty-five graduates of the years 1980 and 1981, all of whom had completed the revised teacher education programs and who were employed as teachers, were contacted through questionnaires and interviews (only a sub-set was interviewed). Principals of schools where eighteen of the follow-up subjects were employed also were interviewed. No control or comparison group was involved. In general, these teachers rated their preparation as average or above. Nevertheless, they felt that they needed more preparation for dealing with exceptional students than they had received. They stressed need for more direct contacts with exceptional students and such specific experiences as participating in IEP conferences as parts of their preservice preparation. Hohn and Brownlee made special note of an observation about a possible divergence in views of school principals and of college staff about the roles of regular teachers. School of Education faculty may have anticipated more "integration and teaming" of regular and special education teachers than was in fact occurring in Kansas schools.

These few remarks about follow-up studies of DGP graduates have been derived from a preliminary report of one small study. Obviously, then, little can be said at this time about the impact of DGP-trained teachers on public education in general or on education of handicapped students in particular. The potential general impact has so far been limited by the fact that relatively few new teachers have been employed in recent years, due to declining enrollments and lowered vacancy rates in teaching positions. It is becoming quite clear, however, that the numbers of new teachers will be increasing gradually in the next few years and that demands will be quite high within a decade when relatively large numbers of older teachers will be retiring. Thus, the efforts made through DGPs to revise curriculums for teacher education may yet have major impact.

A major result of all the DGPs to date is the development of a literature on the processes and necessary substantive aspects of changing teacher education. This literature takes a variety of forms ranging from short statements on particular curriculum issues developed by single project staff members to broad conceptualizations of general changes in teacher education which are required to implement Public Law 94-142. Enough ideas and materials have been developed and are now available to make it possible to be very helpful to colleges that are new at this kind of enterprise. The Teaching Research (1981) study affirmed that, indeed, new projects of recent years were developing more rapidly, at least in part because of the considerable development of ideas and materials which has occurred. Even institutions without Deans' Grants now can profit from the literature created on and for DGPs. A summary statement on this literature has been prepared by Lundholm (1982). Her summary covers major materials systems for teacher education, such as the "I'm A Lot Like You" productions developed at project level at the University of Wisconsin-Milwaukee, plus innumerable shorter pieces from projects plus a variety of products produced by the National Support Systems Project at the University of Minnesota.

Suggestions for the Future of Dean's Grant Projects

The survey of DGP staff members in Spring 1982 (Reynolds, 1982a) indicated that federal supports for DGPs should be continued for at least the next three to five years. It was felt that attempts to change college programs would largely disappear without the evidence of federal priority in the area and some continuing money. Most respondents felt that the new

NCATE standard on special education was beginning to have "clout," and that the work of some national professional groups, such as the National Science Teachers Association, also was most helpful.

An earlier report (National Support Systems Project, 1980) suggested that fedearl supports for DGPs might well be discontinued when the following conditions were achieved:

> - The curricular implications of Public Law 94-142 for regular classroom teacher preparation have been conceptualized acceptably and usefully to the satisfaction of most concerned parties.
> - A literature summarizing the conceptualization and its translation into teacher-preparation materials is available as a regular part of teacher-education literature.
> - Certification and accreditation bodies regularly require high standards of performance in teacher education and teaching practice in all areas of education covered by Public Law 94-142.
> - The implications of Public Law 94-142 have penetrated the schools and colleges so thoroughly that teacher-preparation faculties are initiating significant practices for handicapped students as a part of their local development and maintenance efforts.
> - Significant numbers of operating models of revised teacher-preparation programs are available in all parts of the nation and in institutions of the various sizes and types.
> - The professional organizations of teachers and teacher educators have established clear and strong patterns of activity showing concern and leadership on topics related to Public Law 94-142.
> - Development, evaluation, research, and dissemination functions relating to the preparation of regular classroom teachers to help serve handicapped students have been built into generic R, D, & D agencies of education.
>
> Each preceding criterion for the discontinuance of the Dean's Grant program [also] suggests a dimension of work to be undertaken by OSE, institutions of higher education, and the various professional bodies. (p. 148)

Although very significant progress has been made on each of the above criteria, there is need for some further development - perhaps to be accomplished in three to five years.

Many survey respondents (69%) in the 1982 study suggested that in the future DGPs should give early attention to revisions in preparation programs for school administrators, school psychologists, and counselors as well as teachers. An even larger percentage (89%) of respondents agreed that programs should be developed to give all graduate students in education - our next generation of leaders - background on the policies reflected in Public Law 94-142.

A very strong majority of DGP survey respondents (89%) agreed that teacher educators should make their claims now for adequate life space or academic time for the preparation of high-quality teachers. More than 4 out of 5 respondents also agreed that now is the time for a general move for quality in teacher education or for "state of the art" levels of preparation. Respondents showed wide disagreement, however, on the wisdom of using court proceedings to force "state of the art" programs (Reynolds, 1982b). This latter possibility is one which Gilhool (1982) had raised at a conference of DGP staff members; it caused a great deal of interest.

The operation of a DGP in an institution often raises very general questions about teacher education--involving a wide range of curriculum issues, new challenges to planning processes, a need for more faculty-wide communications and perhaps more time for professional studies. One might wonder whether these aren't larger issues than ought to be raised by a project which has its chief focus on handicapped pupils. Are the DGPs opening up "more than they can chew?" The response in the 1982 survey was that DGP staff members are ready to make a very broad and ambitious effort for improvements in teacher education because they believe that is necessary to implement the important principles expressed in Public Law 94-142.

Most DGP staff members (89%) felt that some kind of temporary national support or networking system was essential to the fulfillment of DGPs. A minimal function of the network would be to identify and disseminate ideas and materials of quality which were developed by project personnel.

A Personal Perspective

The policies expressed in Public Law 94-142, in particular the principle of the "least restrictive environment," requires a major renegotiation of relations between special education and regular education. The capacity of mainstream schools to deal with children who have handicaps must be developed and the preparation of regular teachers must be revised and upgraded substantially. It seems fair to say that handicapped children will not be well served in the mainstream schools unless and until we achieve major commitments and improvements in regular teacher-education programs.

Gilhool (1982), from his legal or juridical perspective, puts the challenge to teacher educators this way:

> ...in a real sense teacher educators are the custodians, if not the progenitors, of the state of the art....we have long passed the point in these United States where colleges of education are one thing and public schooling is another ....The set of relations between schools of education and the public schools is such now that teacher educators, as

> much as the state education authorities and the local education authorities, must consider themselves bound by this duty to use effectively the state of the art. (p. 23)

He refers to the "state of the art" as that higher-level of practice which takes into account all the well-confirmed knowledge in the field in contrast to the "state of the practice," and he argues that teachers can be expected to perform at high levels of competency in terms of the current knowledge base.

Rarely is teacher education operated at "state of the art level," however. Indeed, it seems fair to say that teacher education never has seriously considered operating at such a level. In my view the Dean's Grant program has stimulated significant improvements in many places and quite remarkable changes and improvements in a few others, but there has been nothing like the strong and pervasive move for quality in teacher education which is required. There remains, then, the major question of how and whether teacher educaiton will be able to organize itself to make major reforms.

Left to themselves, individual teacher-education programs and the major organizations that are dedicated to professional development and quality monitoring in teacher education will not make the extensive changes that are needed to achieve the "state of the art".

B. Othaniel Smith (1980), whom I consider to be one of the prominent intellectual leaders in teacher education of recent decades, has said: "Teacher education today...suffers not so much from lack of knowledge as from feebleness of will, from a loss of nerve to use what knowledge there is to shape a coherent and orderly program" (p. 28). Outside forces will be required, including those found in central university offices and on governing boards, in the intellectual leadership that influences public policy, and in the practical domains of politics and community leadership. What we have now is a growing distrust of teacher education; what we need instead is a major move for quality and credibility in teacher education. By such moves the public confidence possibly may be restored--for the good reason that the operations of schools of education would be improved.

The agenda will likely include such difficult elements as the following: (a) court cases in which colleges of education are joined with public schools in cases which test quality of school operations - tests against "state of the art" criteria; (b) the development of much more explicit statements on "state of the art" teacher preparation than are now common; (c) the development and adoption of much higher standards for teacher-education program accreditation, including the use of specific evaluative instruments to measure "state of the art" performance by graduates; (d) extension of teacher-preparation programs to be sure that every graduate is prepared thoroughly to begin practicing the role of teacher "safely" and competently; this standard probably means a five-year pre-service program, at minimum; (e) reduction in the number of teacher-preparation programs in the nation by encouraging those whose capacity to perform at "state of the art" level is limited to drop their programs (or to bring about the elimination through disaccreditation procedures); and (f) a tough reworking of special education teacher-preparation programs for mildly handicapped children to adopt noncategorical or generic models rather than narrowly framed categorical models.

I come to this last point about adopting more generic models of special education teacher preparation because I believe that much of the categorizing of mildly handicapped children is done in "scandalously" (Scriven, 1983) inadequate fashion and because the proliferation of narrowly framed categorical programs is needlessly expensive and inefficient. There is no separate and distinct knowledge base which supports the teaching of reading to "Title I" children vs. "learning disabled" children; yet in many schools we persist in operating these programs with separate teachers, separate entitlement systems and separate funding systems.

Special education programs have received their special categorical funding, from both state and federal sources, mainly on the "input" side. That is, extra funds have been provided simply upon evidence that an exceptional child has been identified and enrolled in a special program. Whether anything truly distinctive and worthwhile is delivered to the child is unrelated to funding. In periods of economic stress, as at present, however, one should anticipate increasing demands for data on the "output" side as a basis for funding (Lynn, 1982). Clearly the field of special education is experiencing a shift to the "output" side in justifying expenditures. It is this writer's judgment that the press for evaluative data on outcomes, along with shrinking funds, will cause important restructuring of a wide variety of special education and other categorically-funded school programs. Special teacher preparation will require corresponding changes.

An increasing number of political observers appear to be coming to an appreciation of the need for a general re-examination of teacher education. A great deal of concern is expressed with teacher competence and the supply of teachers in areas of science education, mathematics education, and computer literacy. There is also a growing appreciation of the need to reformulate the methods of educating handicapped children and their teachers. In a 1982 conference, for example, a number of teacher educators met with some economists, students of public policy, legal advocates for the handicapped, and legislators (Reynolds & Brandl, 1983); the non-educators seemed to be thoroughly convinced of the need for a strong move toward quality in teacher education.

A possible projection of future developments can be imagined. It is based on the assumption that the major existing structures of teacher education will not be able to provide the necessary leadership for radical change because they must compromise on issues important to their members and because so much energy is devoted to protecting the present institutional members. In the projection, a few educators who dare to swim against the current are brought together with a small but concerned group of political and social observers. They commit themselves to spelling out "state of the art" educational standards and then working for the adoption of these standards. The methods they use are public statements, attempts to influence accreditation standards, participation in court suits, organization of technical assistance for IHEs wishing to improve, assisting public bodies (e.g., state legislatures or state boards of higher education) in reviews of teacher preparation programs, and the like. By organizing a strong group that is willing and able to provide a coherent statement on quality teacher education and then using all possible means to enhance their power, perhaps there can be generated some of the motivation that is essential to institute major changes in teacher education. I believe that handicapped children will be well served in mainstream settings only when such a major effort is well underway.

The necessary restructuring of teacher education may be especially difficult in the small teacher-preparation programs that usually are operated in rural areas. Small colleges have small faculties, and they may find it difficult to provide training in all the recommended areas. Also, it may be especially difficult to move toward the extended programs (5 years?) required for better preparation in those colleges in which all programs traditionally terminate at the four-year baccalaureate level. Certainly it will be difficult in the next decade to sustain all the 1200 teacher-training centers that now exist in the nation, and especially the small, rural centers. At the same time, we must not overlook the special strengths which small rural colleges have to offer.

Suppose that the consortia of small colleges which are developing in response to Public Law 94-142 could become the basis for more permanent sharing of staff and other resources in networks of institutions. The staff of a large university, perhaps, could arrange to share specialized staff members for certain limited teaching functions with the institutions in the network. Or, in some cases, it may be feasible for students from several colleges to come together on a regional basis for some of their instruction. Possibly, several small colleges might jointly employ staff members to extend their programs in certain instructional areas. Still another possibility is that regional support systems--perhaps much like the present DGP consortia--would be created to provide continuing supports for faculties in small colleges who are expected to teach in and lead programs over an increasingly diverse set of domains.

In spite of their many difficulties it is to be recognized that small rural colleges have clear advantages, including the ease of communication among the relatively small staff, opportunities for using individualized methods to educate their relatively small student population, and the regularity and comparitive ease of communication with the personnel in the local schools of the region.

Another possibility is that larger colleges and universities might unilaterally offer special preparation for students planning to teach in rural areas. It seems likely that this approach would succeed only under two conditions: 1) a broad and systematic effort were made to recruit students who were already committed by experience and life style to living and working in rural areas; 2) at least significant parts of the program were specially designed to fit rural needs and yet flexible enough to be adaptive to needs of particular students and the regions they represent. Special recruitment of experienced regular teachers from rural areas for training in special fields, such as teaching deaf students, with a system offering stipends to cover costs of training in return for commitment to teach in rural areas, has been used in England for many years (Watson, undated). Western Oregon College, Idaho State University and Murray State University (Kentucky) are among institutions in the United States which have been experimenting with approaches to problems of teacher preparation to meet rural special education needs (Helge, 1982).

Above all, perhaps, is the advantage in rural areas of the long-standing tradition of individualizing programs for children and of cooperating closely with parents in educational planning. The degree of commitment to children and of trust between parents and teachers in such schools are far ahead of most urban school districts, and these are the basic stuff of good programs for children who have exceptional needs. What must be added now is a good deal of the technical knowledge and skill required for good teaching. This will be a major challenge to teacher educators in the colleges of rural areas. We need models of strength and quality in teacher education; and there is no reason to believe that these models will not or should not come from colleges serving the rural areas of the nation!

References

Bates, P. Processes of evaluation and documentation. In B. L. Sharp (Ed.), Dean's grant projects: Challenge and change in teacher education. Washington, DC: American Association of Colleges for Teacher Education, 1982, pp. 159-193.

Behrens, T., & Grosenick, J. K. Dean's Grant Projects: Supporting innovations in teacher education programs. In J. K. Grosenick & M. C. Reynolds (Eds.), Teacher education: Renegotiating roles for mainstreaming. Reston, VA: The Council for Exceptional Children, 1978, pp. 1-6.

Bryson, J. Using structure, action, and power to make teacher preparation responsive to Public Law 94-142. In C. R. Sivage, J. M. Bryson, & K. A. Okun, Politics, power and personality: The roles of deans in Dean's Grant Projects. Washington, DC: American Association of Colleges for Teacher Education, 1982, pp. 71-100, 167-171.

Bryson, J., & Fladmoe-Lindquist, K. Changing teacher education: Addressing the political difficulties. In C. R. Sivage, J. M. Bryson, and K. A. Okun, Politics, power and personality: The roles of deans in Dean's Grant Projects. Washington, DC: American Association of Colleges for Teacher Education, 1982, pp. 101-126.

Gazvoda, M. W. Project demographies and outcomes. In National Support Systems Project, The Dean's Grant Projects: A descriptive analysis and evaluation. Minneapolis, MN: University of Minnesota, College of Education, National Support Systems Project, 1980, pp. 15-28. (See also Gazvoda's doctoral dissertation (unpublished), American University, 1980.)

Gilhool, T. The 1980s: Teacher preparation programs, handicapped children and the courts. In M. C. Reynolds (Ed.), The future of mainstreaming: Next steps in teacher education. Washington, DC: American Association of Colleges for Teacher Education, 1982, pp. [illegible].

Hall, G. E. The Concerns-Based Adoption Model: A developmental conceptualization of the adoption process within educational institutions. Austin, TX: University of Texas, Research and Development Center for Teacher Education, 1974.

Hall, G. E. Facilitating institutional change using the individual as the frame of reference. In J. K. Grosenick & M. C. Reynolds (Eds.), Teacher education: Renegotiating roles for mainstreaming. Reston, VA: The Council for Exceptional Children, 1978, pp. 47-72.

Helge, D. Rural preservice preparation: A planning framework; current and future activities. NRP: National Research and Personnel Preparation Project Newsletter, 4(1), Fall 1982, 4-5, 11-12. (Center for Innovation and Development, Murray State University, Murray, Kentucky 42071).

Hohn, R. L., & Brownlee, J. Recent graduates' ratings of their training and current role in the education of mainstreamed children. Lawrence, KS: University of Kansas Dean's Grant Project, 1982. (mimeographed)

Howsam, R. Public education: A system to meet its needs. In M. C. Reynolds, J. Brandl, & W. Copeland (Eds.), Public policy and educating handicapped persons. Policy Studies Review, Vol. 2, Special Issue No. 1, 1983, 85-108.

Lundholm, K. The development of materials and resources for Dean's Grant Projects. In B. L. Sharp (Ed.), Dean's Grant Projects: Challenge and change in teacher education. Washington, DC: American Association of Colleges for Teacher Education, 1982, pp. 206-227.

BEST COPY AVAILABLE

Martin, E. Dear colleague correspondence announcing the Dean's Grant initiative. Washington, DC: Bureau of Education for the Handicapped, 1974.

National Academy Press. Placing children in special education: A strategy for equity. Washington, DC: Author, 1982.

National Support Systems Project. The Dean's Grant Projects: A descriptive analysis and evaluation. Minneapolis, MN: University of Minnesota, College of Education, 1980.

Okun, K. A. Deans as change agents: Testing assumptions of the Dean's Grant program. In C. R. Sivage, J. M. Bryson, & K. A. Okun, Politics, power, and personality: The roles of deans in Dean's Grant Projects. Washington, DC: American Association of Colleges for Teacher Education, 1982, 127-166.

Reynolds, M. C. Facing the future in Dean's Grant Projects. In B. L. Sharp (Ed.), Dean's Grant Projects: Challenge and change in teacher education. Washington, DC: American Association of Colleges for Teacher Education, 1982, pp. 194-205. (a)

Reynolds, M. C. (Ed.). The future of mainstreaming: Next steps in teacher education. Washington, DC: American Association of Colleges for Teacher Education, 1982. (b)

Reynolds, M. C., Birch, J. W., Grohs, D., Howsam, R., & Morsink, C. A common body of practice for teachers: The challenge of Public Law 94-142 to teacher education. Washington, DC: American Association of Colleges for Teacher Education, 1979.

Reynolds, M. C., Brandl, J., & Copeland, W. (Eds.). Public policy and educating handicapped persons. Policy Studies Review, Vol. 2, Special Issue No. 1, 1983.

Rhoads, D. External evaluation of the National Support Systems Project. College Park, MD: College of Education, University of Maryland, 1979.

Sandefur, J. T. Teacher education's evaluation of graduates: Where are we going and how do we know when we get there? In S. M. Hord, T. V. Savage, & L. T. Bethel (Eds.), Toward usable strategies for teacher education program evaluation. Austin, TX: Research and Development Center on Teacher Education, University of Texas, 1982, pp. 9-22.

Scriven, M. Comments on Gene Glass. In M. C. Reynolds, J. Brandl, & W. Copeland (Eds.), Public policy and educating handicapped persons. Policy Studies Review, Vol. 2, Special Issue No. 1, 1983, 79-84.

Sharp, B. The experiences of Dean's Grant consortia. In B. L. Sharp (Ed.), Dean's Grant Projects: Challenge and change in teacher education. Washington, DC: American Association of Colleges for Teacher Education, 1982, pp. 143-158.

Sivage, C. R. Advocates of change: An analysis of deans' roles as directors of Dean's Grant Projects. In C. R. Sivage, J. M. Bryson, & K. A. Okun, Politics, power, and personality: The roles of deans in Dean's Grant Projects. Washington, DC: American Association of Colleges for Teacher Education, 1982, 1-70.

Smith, B. O. On the content of teacher education. In G. E. Hall, S. M. Hord, & G. Brown (Eds.), Exploring issues in teacher education: Questions for future research. Austin, TX: Research and Development Center in Teacher Education, University of Texas, 1980, pp. 7-31.

Sontag, E. Perspectives on the status and future of special education and regular education. In M. C. Reynolds (Ed.), The future of mainstreaming: Next steps in teacher education. Reston, VA: The Council for Exceptional Children, 1982.

Teaching Research. Executive summary of the Dean's Grant Evaluation Study. Monmouth, OR: Author, 1981.

U.S. Dept. of Education. Annual report to Congress on the implementation of Public Law 94-142. Washington, DC: Government Printing Office, 1982.

Watson, T. J. (formerly Professor in Education of the Deaf, University of Manchester). Personal communication to the writer.

Appendix A

Institutions Having Dean's Grant Projects in the Period 1975-1983*

ALABAMA
- Alabama A & M University
- University of Alabama/Birmingham
- University of Alabama/University
- Auburn University/Auburn
- Auburn University/Montgomery
- University of South Alabama

ALASKA
- University of Alaska

AMERICAN SAMOA
- Community College of American Samoa

ARIZONA
- Arizona State University
- Northern Arizona University
- University of Arizona

ARKANSAS
- University of Arkansas/Fayetteville
- University of Arkansas/Little Rock
- University of Arkansas/Pine Bluff
- Arkansas State University
- Henderson State University

CALIFORNIA
- California State Polytechnic University
- California State University/Chico
- California State University/Fresno
- California State University/Hayward
- California State University/Los Angeles
- California State University/Northridge
- Pacific Oaks College
- University of the Pacific
- San Diego State University
- University of San Diego
- San Francisco State University
- San Jose State University

COLORADO
- Colorado State University
- University of Colorado/Boulder
- University of Colorado/Colorado Springs
- University of Denver
- Fort Lewis College
- University of Northern Colorado

CONNECTICUT
- University of Connecticut

DELAWARE
- University of Delaware

DISTRICT OF COLUMBIA
- American Association of Colleges for Teacher Education
- American Society of Allied Health Professions
- American University
- The Catholic University of America
- The University of the District of Columbia
- Howard University
- National Alliance of Black School Educators
- George Washington University

FLORIDA
- University of Central Florida
- Florida A & M University
- University of Florida
- University of Miami
- Stetson University
- University of West Florida

GEORGIA
- Atlanta University
- Georgia Southern College
- North Georgia College

---

*Only a few institutions have had DGPs for the entire 1975-1983 period. Most had grants for 3 years, but some had DGPs for only 1 or 2 years.

HAWAII
  University of Hawaii at Manoa

IDAHO
  Idaho State University
  University of Idaho

ILLINOIS
  Bradley University
  Eastern Illinois University
  Illinois State University
  University of Illinois
  Northeastern Illinois University
  Northern Illinois University
  Roosevelt University
  Southern Illinois University
  Western Illinois University

INDIANA
  University of Indiana
  Purdue University

IOWA
  Drake University
  Iowa State University
  University of Iowa
  University of Northern Iowa
  Tri-College Dept. of Education
    (Clarke College, Loras College,
    & University of Dubuque)

KANSAS
  Associated Colleges of Central Kansas
  Emporia State University
  Kansas State University
  University of Kansas
  Wichita State University

KENTUCKY
  Eastern Kentucky University
  University of Kentucky
  University of Louisville
  Murray State University
  Western Kentucky University

LOUISIANA
  Grambling State University
  Louisiana State University
  University of New Orleans

MAINE
  University of Maine/Orono

MARYLAND
  American Occupational Therapy Assn.
  Bowie State College
  Coppin State College
  Hood College
  University of Maryland
  Morgan State University

MASSACHUSETTS
  Boston College
  Boston University
  Regis College
  Simmons College
  Westfield State College

MICHIGAN
  Central Michigan University
  Madonna College
  Michigan State University
  University of Michigan

MINNESOTA
  College of Saint Teresa
  University of Minnesota/Duluth
  University of Minnesota/Minneapolis
  Moorhead State University
  Winona State University

MISSISSIPPI
  Alcorn State University
  Jackson State University
  University of Mississippi
  University of Southern Mississippi

MISSOURI
  Central Missouri State University
  University of Missouri/Columbia (2)
  University of Missouri/St. Louis
  St. Louis University
  Southwest Missouri State University

MONTANA
  Eastern Montana College
  Montana State University

NEBRASKA
  University of Nebraska/Lincoln
  University of Nebraska/Omaha

NEVADA
- University of Nevada/Las Vegas
- University of Nevada/Reno

NEW HAMPSHIRE
- University of New Hampshire

NEW JERSEY
- Glassboro State College
- Kean College of New Jersey
- Rutgers College
- Trenton State College

NEW YORK
- Bank Street College of Education
- City University of New York/ Brooklyn College
- City University of New York/ Medgar Evers College
- City University of New York/ York College
- Fordham University at Lincoln Center
- Hofstra University
- Hunter College
- Long Island University
- New York University
- College of St. Rose
- State University of New York/ Albany
- State University of New York/ Binghamton
- State University of New York/ Brockport
- State University of New York/ Fredonia
- State University of New York/ Potsdam
- Syracuse University

NORTH CAROLINA
- Appalachian State University
- Barber-Scotia College
- Lenoir-Rhyne College
- Livingstone College
- North Carolina Central University
- North Carolina State University
- University of North Carolina at Chapel Hill
- University of North Carolina at Charlotte
- Western Carolina University

NORTH DAKOTA
- Minot State College
- North Dakota State University
- University of North Dakota

OHIO
- University of Akron
- Bowling Green State University
- Case Western Reserve University
- University of Cincinnati
- Cleveland State University
- Ohio State University
- Ohio University
- The University of Toledo

OKLAHOMA
- Oklahoma Baptist University
- Oklahoma State University

OREGON
- University of Oregon
- Portland State University
- University of Portland
- Southern Oregon State College
- Western Oregon State College

PENNSYLVANIA
- Cheyney State College
- Duquesne University
- Edinboro State College
- Lock Haven State College
- Mansfield State College
- Pennsylvania State University
- University of Pittsburgh
- Temple University

PUERTO RICO
- Catholic University of Puerto Rico
- I.I.A. of the World University
- University of Puerto Rico/Rio Piedras
- University of Puerto Rico/San Juan

SOUTH CAROLINA
- Furman University

SOUTH DAKOTA
- Augustana College
- The University of South Dakota

TENNESSEE
- Eastern Tennessee State University
- George Peabody College for Teachers/ Vanderbilt University
- Memphis State University
- Tennessee State University
- University of Tennessee/Chattanooga
- University of Tennessee/Knoxville

TEXAS
- University of Houston
- Lamar University
- North Texas State University
- Prairie View A & M University
- Southern Methodist University
- Stephen F. Austin State University
- Texas A & M University
- Texas Southern University
- Texas Tech University
- University of Texas/Austin
- University of Texas/Dallas
- Texas Woman's University
- Trinity University

UTAH
- Utah State University
- University of Utah

VERMONT
- University of Vermont

VIRGIN ISLANDS
- College of the Virgin Islands

VIRGINIA
- Hampton Institute
- James Madison University
- George Mason University
- Norfolk State University
- Old Dominion University
- Radford University
- Virginia Commonwealth University
- Virginia State University
- Virginia Union University

WASHINGTON
- Eastern Washington University
- Gonzaga University
- Pacific Lutheran University
- Washington State University
- University of Washington
- Whitworth College

WEST VIRGINIA
- Bethany College
- Marshall University
- West Virginia University

WISCONSIN
- University of Wisconsin/LaCrosse
- University of Wisconsin/Milwaukee
- University of Wisconsin/Oshkosh
- University of Wisconsin/Whitewater

WYOMING
- University of Wyoming

APPENDIX B

Resource Units and Authors

	Unit Topic	Author
1.	Classroom accommodations for exceptional learners	JoBeth Allen (Kansas State University) Frances L. Clark (University of Louisville) Patricia Gallagher (University of Kansas) Faith Scofield (University of Kansas)
2.	Classroom assessment and evaluation strategies	Alan M. Hofmeister (Utah State University Caroline N. Preston (Utah State University)
3.	Curriculum assessment and modification	Christine O'Connell Mason (Eastern Montana College) Susan Blom Raison (Southeast Minnesota Education Cooperative Service Unit)
4.	Variables in exceptionality	Jack W. Birch (University of Pittsburgh)
5.	Writing Individualized Education Plans (IEPs)	Ann L. Stewart (North Carolina State University)
6.	Assessing and promoting reading skills	Michael F. Graves (University of Minnesota)
7.	Assessing and promoting language arts skills	James A. Poteet (Ball State University)
8.	Class management	Richard Bents (University of Minnesota) K. Charlie Lakin (University of Minnesota) Maynard C. Reynolds (University of Minnesota
9.	Social/philosophical-ethical foundations	Christopher Lucas (University of Missouri)
10.	Behavior modification procedures	Lanny Morreau (Illinois State University)
11.	Developing goals and objectives	Lynn S. Fuchs (Wheelock College) Stanley L. Deno (University of Minnesota)

12.	Parent-teacher interactions	Roger Kroth (University of New Mexico) Roberta Krehbiel (University of New Mexico)
13.	Formal social observation	Frank H. Wood (University of Minnesota)
14.	Legal influences on educating special needs students	Ann P. Turnbull (University of Kansas) Judith Leonard (University of North Carolina) H. Rutherford Turnbull (University of Kansas)
15.	Teaching children about individual differences	Mara Sapon-Shevin (Cleveland State University)
16.	Promoting pupil psychological growth	Angelo V. Boy (University of New Hampshire)
17.	Psychological/human development foundations	Ronna Dillon (Southern Illinois University)
18.	Counseling skills for teachers	Norman Sprinthall (North Carolina State University)
19.	Communication skills for teachers	Carolyn M. Del Polito (American Society of Allied Health Professions)
20.	Principles and values in special education	H. Rutherford Turnbull (University of Kansas) Ann P. Turnbull (University of Kansas) Marilyn Mulligan (University of Kansas)
21.	Individualized instructional systems	Margaret C. Wang (University of Pittsburgh)
22.	Working with minority students and parents	Ronald W. Henderson (University of California-Santa Cruz)
23.	Working with support staff and allied professions	Susan M. Swap (Wheelock College)
24.	Assessing and promoting basic "life skills"	Donn Brolin (University of Missouri)

25.	Promoting cooperative relationships in classrooms	David W. Johnson (University of Minnesota) Roger T. Johnson (University of Minnesota)
26.	Consultation skills for teachers	Joel Meyers (Temple University)
27.	Peer and cross-age tutoring	Joseph R. Jenkins (University of Washington) Linda M. Jenkins (Lake Washington [WA] Schools)

Appendix C

DGP Consortia and Institutional Members

- Alabama A & M University
  - Miles College
  - Oakwood College
  - Stillman College
  - Talladega College

- Tri-Colleges of Dubuque (Iowa)
  - Clarke College
  - University of Dubuque
  - Loras College

- Morgan State University
  - Coppin State University
  - University of Maryland/Baltimore County
  - Towson State University

- University of Nebraska/Lincoln
  - Chadron State College
  - Concordia Teachers College
  - Doane College
  - Kearney State College
  - Peru State College
  - Union College
  - Wayne State College

- James Madison University
  - Averett College
  - Bridgewater College
  - Clinch Valley College
  - Eastern Mennonite College
  - Emory and Henry College
  - Hollins College
  - Longwood College
  - Mary Baldwin College
  - Mary Washington College of the University of Virginia
  - Randolph-Macon Woman's College
  - Roanoke College
  - St. Paul's College
  - Shenandoah College
  - Sweet Briar College
  - University of Richmond
  - Virginia Intermont College

- Marshall University
  - Bluefield State College
  - Concord College
  - Glenville State College
  - University of Charleston
  - West Virginia College of Graduate Studies
  - West Virginia Institute of Technology
  - West Virginia State College

LOCAL IMPLEMENTATION OF PL 94-142: SIMILARITIES AND DIFFERENCES BETWEEN RURAL AND NONRURAL LOCAL EDUCATION AGENCIES (LEAs)

May 1983

by

Anne R. Wright
Social Sciences Center

333 Ravenswood Ave. • Menlo Park, CA 94025
(415) 859-6200 • TWX: 910-373-2046 • Telex: 334 486

Prepared for

Special Education in Rural America, a project supported by Research Contract No. 400-81-0017 from the National Institute of Education to the Department of Special Education, The University of Kansas.

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

CONTENTS

Acknowledgments ii

I INTRODUCTION 1

Overview of SRI's Longitudinal Study 1

Background and Purpose of this Paper. 2

II IMPLEMENTATION OF PL 94-142 IN RURAL AND NONRURAL SITES 4

General Sequence of Implementation of PL 94-142 4

Variation in Progress in Rural and Nonrural LEAs. 6

Differences in Type of Effect 7

Quality of Resulting Special Education System 8

III CONSTRAINTS TO PROGRESS IN IMPLEMENTATION: RURAL VS. NONRURAL LEAs 9

Recruitment and Retention of Qualified New Personnel and Low Level of Staff Changes 10

Isolation from Information Sources in the Broader Society and Resistance to Change. 11

Problems Related to Rural Geography 13

IV DIFFERENCES IN PL 94-142 IMPLEMENTATION PROGRESS AMONG THE RURAL DISTRICTS. 15

Organizational Structure of Administrative Unit 15

Nature of Administrative Leadership 17

Proximity to Human Services Agencies and Universities 18

External Factors. 18

REFERENCES

ACKNOWLEDGMENTS

The technical assistance of Marian S. Stearns and Rhonda Ann Cooperstein of SRI International in the preparation of this paper is greatly appreciated. Their thoughtful review of various drafts contributed greatly to refinement of the final product. Thanks also are due Jacquelyn Brown for her superb secretarial assistance.

I INTRODUCTION

Overview of SRI's Longitudinal Study

As part of its overall evaluation of local progress in meeting the intent of Public Law 94-142, the Education for All Handicapped Children Act, the Special Education Programs (SEP) unit of the U.S. Department of Education contracted with SRI International to conduct a 5-year longitudinal study. The SRI study was designed to complement other SEP studies of the law, by providing an in-depth understanding of the process of implementing the law at the local education agency (LEA) level.* It is at the LEA level that the law directly affects handicapped children and their parents. Thus, the longitudinal study was based on case studies of how a variety of urban, suburban, and rural school systems implemented PL 94-142 from 1978 to 1982.**

Initially, in Spring 1978, SRI selected 22 study sites in 9 states to represent the variety of LEAs in the United States in terms of characteristics that would make a difference for the implementation of PL 94-142. These characteristics included:

---

* LEAs are a diverse group of administrative units below the state level. In addition to local school districts, LEAs in our study included county school systems, intermediate units, and joint agreements or consortia among districts.

** Although PL 94-142 was passed by Congress in 1975, the mandated effective date for provision of a free appropriate public education (FAPE) to each handicapped child was reached just as the SRI study began.

- Compatibility between state laws and PL 94-142.
- State funding formula for special education and the state system of organization for special education.
- Availability of local resources (i.e., the amount of local funding, facilities, qualified personnel, administrative leadership, and community involvement).
- Accessibility of resources (i.e., geographic size and population dispersal).
- Presence of residential institutions, collaborative relationships with other districts, state-supported special schools, and separate buildings for special education.

The 22 LEAs originally selected for case studies varied in the characteristics of the state systems of education in which they were embedded, as well as in local characteristics.* SRI's findings were based primarily on interviews conducted by our staff with a wide variety of LEA personnel and community members (e.g., administrators, principals, teachers, psychologists, parents, representatives of human services agencies) from these sites. Through a synthesis of our findings we were able to describe various patterns of implementation over time in a variety of urban, suburban, and rural LEAs over 4 complete school years (Wright et al., 1982).

Background and Purpose of this Paper

Since 1981, the directors of SRI's longitudinal study have served on the National Advisory Council for the University of Kansas' Special Education in Rural America Project. Based on our research experiences in various local circumstances, we have provided input to the Kansas research team during several stages of their study.

---

* There were 22 LEAS in the original sample. Budgetary constraints resulted in reduction of the sample size in the last 3 years of the study to a final sample size of 16.

The University of Kansas commissioned us to prepare this paper specifically comparing implementation processes in our study's rural LEAs with the processes in the other LEAs. In this paper, we draw upon our experience in the four rural sites that we studied for 5 years. We present our findings concerning similarities in the sequence of PL 94-142 implementation and variation in progress, then describe constraints to progress in rural versus nonrural sites. Finally, we discuss the differences among rural districts themselves.

Although we designed our sampling procedure to ensure that our sites manifested considerable variation on several factors deemed most likely to explain differences in local implementation of PL 94-142, the original study was not designed primarily for rural/nonrural comparisons, and the generalizability of our findings from four rural districts in different states and different contexts is limited.

II IMPLEMENTATION OF PL 94-142 IN RURAL AND NONRURAL SITES

General Sequence of Implementation of PL 94-142

We observed striking similarities among rural and nonrural districts in the sequence they followed for implementing the law's requirements. When faced with the challenge of implementing PL 94-142, LEAs initially focused their attention on procedural changes in response to the law, and the procedural provisions (e.g., parent notice and consent, due process, individualized education programs or IEPs) of the law were put in place in the first year or two after the law took effect. Once these procedures were put in place, they quickly became a familiar and routine part of special education.

The pattern of implementation followed changes consistent with the models of implementation of innovation in education, such as those developed by Hall and Loucks (1977) and Berman and McLaughlin (1978). In these models, implementation proceeds from orientation and adoption, to implementation (marked by mechanical use followed by routine use and refinements), followed by institutionalization. Although it is too simplistic to assume that all school districts moved smoothly, at the same rates, or to the same point along this dimension from orientation to institutionalization, we observed similar patterns of procedural implementation among rural and nonrural LEAs.

Once the procedural provisions were in place, LEAs then turned their attention to expanding the scope and comprehensiveness of their special education programs and related services (SEARS). They extended SEARS to children of different ages and/or handicapping conditions, and they attempted to meet the least restrictive environment (LRE) mandate by expanding the continuum of available program options. Although the concepts and goals underlying the SEARS and LRE provisions were adopted and internalized by LEAs, the lack of available resources interrupted the expansion of programs, services, and the continuum of program options necessary to fulfill these goals. Whereas we observed LEAs expanding services to achieve these goals in the 1978-79 school years, we found that the rate of expansion of programs and services had slowed dramatically by the 1980-81 school year as LEAs struggled to maintain the status quo with fewer financial resources. In 1981-82, the trend continued; we saw a few LEAs making cuts--mostly in related services rather than in basic programs, but we also found our first evidence of cuts in special education programs.

Finally, when PL 94-142 was first implemented, LEAs put little time and attention into inservice training of local personnel, whether through the state's comprehensive system of personnel development or through the district. Most of the training that was provided concerned an orientation to the law and its procedural aspects. Although district personnel tended to say that training was important, LEAs generally placed more emphasis on changing procedures and increasing the scope and comprehensiveness of special education programs and services. Inservice training seemed like a luxury when districts faced cuts in services and programs and personnel layoffs. When cuts had to be made, districts cut training expenses before cutting programs and services (i.e., staff).

These similarities in the general sequence of PL 94-142 implementation were further validated and given some generalizability by state education agency (SEA) personnel we interviewed about LEAs we did not visit. In general, the sequence of implementation of PL 94-142 was not affected by differences in such LEA characteristics as the rural/suburban/urban nature of the LEA jurisdiction, the nature and size of the handicapped population, the socioeconomic status of the parents in the community, or the level of resources of the LEA. That is, LEAs of very different makeups showed the same general sequence of implementation; the sequence depended primarily on the interaction of the nature of the law's requirements with the basic nature of LEAs.

Variation in Progress in Rural and Nonrural LEAs

Although we observed that LEAs of very different makeups showed the same general sequence of PL 94-142 implementation, the types of effect the law had, as well as the "quality" of the resulting special education system, did relate to the characteristics of the LEA. That is, we observed a cluster of features, including the amount of local funds for education, the number and kind of education-related resources (e.g., trained staff, mental health facilities, private schools), and the degree of local support for the schools, that were related to the degree to which an LEA had met the goals embodied in PL 94-142 prior to the law's passage.

Partly because of their isolation, more of the rural LEAs lagged behind the state of the art in special education in 1978, when our study began, and maintained a lagging position, relative to other districts, when our visits ceased in 1982. Partly because of their geography, these LEAs had many basic gaps in the scope and comprehensiveness of special education programs and services (e.g., unserved or underserved handicapped children), as well as less individualized special education programs.* The more progressive, resource-rich and often-suburban LEAs already had fairly broad-based special education programs and related services at the beginning of our study. We have seen differences in effect as well as in the quality of the resulting special education system in these two types of districts.

---

* We also saw poor urban areas, or entire cities (in states that had lagged behind in special education practices) where services to handicapped children were also less available and less advanced than in the more progressive, usually suburban, school districts and consortia.

Differences in Type of Effect

In those rural LEAs that had basic gaps in SEARS before the passage of PL 94-142, the major effect of the law was to enable administrators to fill some of these gaps. For example, they used PL 94-142 funds to provide programs for previously unserved or underserved specific learning disability (SLD) and educable mentally retarded (EMR) populations, and to provide basic related services such as speech therapy. Some rural sites with traditional attitudes and low levels of resources filled in some basic gaps in SEARS using the clout associated with the law (including both the goal statements and the regulations) as well as the money. For example, in one rural district, the special education director with some PL 94-142 and some local funds was able to hire two audiologists who could screen students for evidence of hearing impairments. In another rural LEA, district administrators were able to provide services to severely mentally retarded (SMR) children who were residents of a local mental health institution by embarrassing the state into partial funding of staff positions.

Despite the ability of rural administrators to fill in some basic gaps in their special education delivery systems, the order of magnitude of change that occurred in the rural sites was much less than in other non progressive LEAs (e.g., fiscally constrained large urban LEAs with large numbers of children with unmet needs, cities in states traditionally less responsive to the needs of handicapped children). For example, rural administrators often used PL 94-142 flow-through money to add one or two classes to better serve a group of handicapped children. In large urban LEAs with a large number of unserved or inappropriately served children, the large amount of PL 94-142 funding attendant on whole-city enrollments was directed to the most noticeable problems. Thus, in one inner city, it was necessary for LEA administrators to add 50 or more classes.

The law resulted in a different type of effect in more progressive LEAs that had up-to-date, broad-based special education systems before the passage of PL 94-142. In this type of LEA, the law resulted in the refinement of existing special education programs and related services. Because districts of this type are relatively rich in resources, the money associated with PL 94-142 had less effect; the major aspect of the law affecting the refinements and changes was the law's clout. A spokesman from one such district characterized the effect of the law: "PL 94-142 gave us the clout to expand and refine the continuum of special education and related services available to children." Another added, "The law greatly enhanced programs."

This pattern of effects corresponds with the way in which PL 94-142 money was used. That is, LEAs tended to allocate this money to related services and refinements, unless it was needed for basic programs.

Quality of Resulting Special Education System

Differences among LEAs also affected the quality of the procedures, programs and services, and training that were implemented. Before the passage of PL 94-142, districts varied in the quality of special education programs and services, parental involvement, evaluation procedures, and so forth. For example, some progressive nonrural districts had a head start on rural and large urban districts in the range of program options available and the amount of individualized attention a child received during evaluation. When PL 94-142 was passed, most districts made changes, as described earlier. However, the law did not alter the relative standing among the progressive and the nonprogressive districts. For example, those districts that had a head start continue to have more informed consent, more mainstreaming, a larger continuum of options, more programs and services, better nondiscriminatory/multidisciplinary evaluation, and so forth. The law did not erase these inequalities. However, the most important point is that the law did raise the level in districts that had lagged behind.

III CONSTRAINTS TO PROGRESS IN IMPLEMENTATION: RURAL VS. NONRURAL LEAS

During SRI's longitudinal study, we observed that all LEAs were constrained in making progress toward full implementation of PL 94-142 by three major factors: inadequacy of available resources, limited knowledge and skills among educational personnel, and organizational barriers. We concluded that meeting the intent of the law and achieving full implementation requires strategies for obtaining additional resources, as well as strategies for more effective training of special and regular education teachers and for crossing the organizational boundaries between regular and special education.

Although these factors affected all LEAs, rural and nonrural alike, the constraints to progress in implementation seemed worse in the rural than in the nonrural districts. For example, lack of money was a major factor inhibiting implementation of PL 94-142 in all of the rural sites that SRI visited. Although the infusion of federal money helped rural districts to fill in some basic gaps in their special education service delivery systems, insufficient local resources resulted in programmatic gaps remaining (e.g., SLD services not present in all schools). As one rural LEA special education director commented: "The community doesn't want property taxes increased and that's what it'll take... even with the PL 94-142 money, it's still not enough."

Not only did the major inhibiting factors seem worse in rural areas, several other factors specific to rural LEAs constrained implementation progress.* These factors include:

---

* Some of these factors were also noted as problems in implementing PL 94-142 in rural areas by Helge (1980).

- Difficulty in recruiting and retaining new qualified staff; low level of staff changes.
- Isolation from information sources in the broader society and resistance to change.
- Problems related to rural geography (e.g., long distances between schools, isolated or difficult terrain, transportation costs).

Recruitment and Retention of Qualified New Personnel and Low Level of Staff Changes

Although there were often reports of recruitment and retention problems among certain categories of special education personnel in nonrural sites, we found that recruitment and retention of new qualified personnel was a pervasive problem in rural areas. Rural LEA administrators noted that young professionals entering the field might be attracted to rural areas at first, but that they found living in such areas to be too socially and culturally isolated and, thus, relocated elsewhere to pursue their professional interests. Often, administrators indicated that the "best bet" was to encourage bright, motivated local students to train in special education and then return to teach in their local community. Pay scales in rural areas also reflected the relatively low fiscal resources that had to be stretched across regular and special education programs and services. Salaries were usually higher in nonrural areas.

In general, staff changed less often in the rural sites than in most of the nonrural areas. Because there was little "new blood" to fill available teaching positions, "oldtimers" were left to fit PL 94-142 requirements into their usual way of doing things. Many had not been trained in the "new paradigm" of special education (e.g., IEPs, multidisciplinary evaluation) and changed their traditional educational practices slowly so that the actual amount of change appeared minimal.

Isolation from Information Sources in the Broader Society and Resistance to Change

In general, rural areas are isolated from the information sources of the broader society. Thus, one of the most striking things that we noted when we initially visited the rural sites was the fact that even the most remote rural site had heard of PL 94-142 and its regulations. This was true even if the state had not issued guidelines. This was suprising because our experience had shown knowledge of other federal educational programs to be low in rural areas (Knapp et al., 1983). Rural areas tend to be isolated from the universities, newspapers, and visitors from other sites that are common to urban and suburban districts. As a result, "the word" travels more slowly. Knowledge of innovative educational practices may reach the rural areas only after many urban and suburban areas have accepted changes in the state of the art and adopted new practices.

In addition to being more isolated than nonrural district administrators, rural district administrators and personnel tend to resist change more than their nonrural counterparts. We characterized their more traditional mentality as being part of the "old paradigm" model of special education. That is, more rural than urban or suburban educators tended to share the attitude that self-contained settings (rather than resource rooms or other mainstreamed settings) were the most appropriate placements for special education children. As one rural special education director commented: "it seems like we just got enough staff a few years ago to have special classes. And now we're asked to put these kids back in regular classes." Such attitudes did not facilitate the expansion of a continuum of program options for handicapped children. In fact, even when resource rooms were adopted, often in response to financial incentives, rural special educators still believed that children would be better served in a self-contained setting. For example, teachers often told us that they believed that handicapped students would learn more if they could be in a self-contained classroom rather than a resource room.

At the beginning of our study, we noted that the traditional role boundaries between regular and special education, as well as between parents and school staffs, posed siginificant obstacles to implementing the intent of PL 94-142 to expose handicapped and nonhandicapped students to one another and to designate parents as advocates for their children's education. These boundaries may have shifted slightly over time in rural areas, but they still persist more in rural than in nonrural areas.

In general, we found a traditional rural mentality among parents that "the schools know best." Parents resisted changing their reliance on the schools to make educational decisions about their children's special education needs. Their resistance hindered implementation of greater parental involvement in educational decisionmaking. Thus, although parents in rural districts are probably better informed than before about special education and what the schools can offer handicapped children, their awareness is not nearly as high as in nonrural sites where parents are active and well informed. Also, two rural districts reported a larger percentage of parental refusal of special education services for their children than did urban or suburban districts. There is still a greater stigma associated with handicapping conditions and special education in rural than in urban communities.

Regular and special education personnel played very few boundary crossing roles in the rural districts. Rural LEAs did not create new roles (e.g., mainstreaming coordinator) or expand old roles (resource teacher) to meet the intent of the Act. The strategy of using "boundary crossers" developed primarily in urban and suburban districts to cope with the limitations imposed by the organizational barriers that frequently exist between regular and special education. The boundary crossers' job is to facilitate the coordination that is required for activities such as mainstreaming and IEP development and use. We found that their role has had a significant effect in minimizing barriers to implementation of PL 94-142.

Problems Related to Rural Geography

An additional obstacle to PL 94-142 implementation in rural sites is the high price paid for the distances between schools and services. Children often had to be bussed in order to receive special education services that were not available at their home schools. For example, in one district, the lack of enough SLD programs and services across the county initially resulted in excessive transportation time for children who had to be bussed long distances in order to receive such services. As the LEA was able to expand its SLD programs and services with the help of PL 94-142 funds, most children were able to be served in their home schools.

High transportation costs were also a problem. In at least one of the resource-poor rural districts, transportation was provided mainly for more severely handicapped students (TMR, SMR). Children who needed programs and services for the mildly handicapped were served in their home schools, regardless of the available special education programs. Since some very isolated small schools had no resource rooms or self-contained classes at all, children in these schools were not even referred for special education.

The major reason that the LEA referred to above did not provide transportation for the mildly handicapped was primarily because of its financial constraints. In addition, however, the location of one hamlet in this district in a mountainous area, also made transportation difficult. The cost/benefit ratio to a rural LEA is radically altered by this factor. Itinerant services are a frequent solution, but are not always suitable. Transportation costs remain a big factor in rural areas. For example, in another small rural LEA, three mentally handicapped children required transportation to a special facility in the county in order to receive appropriate special education and related services. The estimated cost to bus these children was $25,000, but the overall district budget to serve all the children within its jurisdiction was $75,000. As one of the school board members commented: "I don't begrudge anyone an education, but we can't figure out a way to make ends meet."

The provision of transportation was also difficult in another rural LEA located in a mountainous area. A family with a handicapped child had moved to a very remote area of the county. Although it was over 100 miles roundtrip to the special school that the child needed to attend, the parents were aware of their rights and wanted transportation for their child. The family's home was on an inaccessible mountain, and to reach it, the school bus would have to drive through a small river during certain times of the year. The bus company estimated that it would cost $158 additional dollars a day to make that trip. Because the LEA knew that it would lose if this case went to a due process hearing (i.e., it was responsible for the provision of transportation), they negotiated with the parents and convinced them to drive the child to the special school and receive reimbursement for mileage from the district.

IV DIFFERENCES IN PL 94-142 IMPLEMENTATION PROGRESS AMONG THE RURAL DISTRICTS

Although the rural districts SRI visited shared similar constraints, they differed from one another on a number of other factors that either facilitated or inhibited their progress in implementing PL 94-142:

- Organizational structure of administrative unit
- Nature of administrative leadership
- Proximity to human services agencies and universities
- External factors (e.g., state law, deinstitutionalization)

These factors also influenced implementation in nonrural LEAs, but only the rural LEAs are discussed here.

Organizational Structure of Administrative Unit

SRI's overall group of study sites were selected to represent the variety of LEAs in the United States in terms of characteristics that would affect the implementation of PL 94-142. In addition to local school districts, the diverse group of LEAs selected included county school systems, intermediate units, joint agreements, and consortia among districts. Other than selecting a variety of administrative units below the state level, we did not select rural LEAs on the basis of their membership in cooperatives. Thus, unlike the University of Kansas study, we did not go into depth on such issues as the organization and governance of rural LEAs in cooperative arrangements. However, we did observe differences in implementation among rural districts with different organizational structures.

Of the four rural LEAs included in SRI's longitudinal study over the full course of the study, two represented states with mandated special education administrative units. These units, comprised of several school districts, were organized to administer the provision of SEARS to handicapped children within the larger jurisdiction. Under such organizational structures, individual districts typically provided some SEARS (e.g., SLD programs, speech therapy services), while the centralized administrative unit was responsible for the provision of more intensive programs for the SED, EMR, TMR, and SMR populations, and low-incidence handicapped populations (i.e., hearing impaired, visually impaired, orthopedically handicapped).

The other two rural districts were individual school systems that either contracted with other LEAs to provide some SEARS or participated in their respective state's regionalized educational service areas. That is, the individual districts administratively were responsible for the provision of SEARS to handicapped children. However, in order to provide SEARS to severely handicapped and low-incidence populations, these districts contracted with other LEAs and/or a regional education center.

Handicapped children had greater access to SEARS within the two rural districts that were members of special education administrative (or cooperative) units. The capacity of the central unit to provide some SEARS to children across LEAs appeared to be greater than the capacity of the small rural districts to provide some services, and contract out for others. Although only four rural sites were visited, the deployment of personnel seemed more efficient and cost-effective within a cooperative unit than it did in the small individual districts. For example, the unit determined how to maximize TMR and SMR services across all districts.

In sum, nothing was found that would negate or discount the advantages of membership in an administrative unit designed specifically to provide special education and related services to handicapped children. Districts involved in cooperative administrative arrangements could provide a higher level of service delivery than they would have been able to provide on their own (e.g., the provision of services to widely dispersed low-incidence populations). Thus, implementation of the intent of PL 94-142 to provide services to all handicapped children (with priority to the previously unserved or underserved) appeared to be enhanced by cooperative membership.

Nature of Administrative Leadership

Over all school districts, rural and nonrural, we found that the leadership in special education did affect the implementation of PL 94-142. The nature of administrative leadership in special education varied across rural LEAs. The two rural districts included in larger administrative units tended to move a bit faster toward implementation of the various provisions of the law. Leadership at the central office level was shared by at least two key administrators who then delegated various special education responsibilities to their representatives within the member LEAs. These central office administrators were in a position to take an overview of the special education service delivery system and plan accordingly for filling gaps based on the needs of the overall system. They had a centralized plan of change or represented leadership authority that set broad policy with which the member LEAs were expected to conform. Even if the individual districts resisted changes in policies and practices, there was pressure from the "central office" to comply with such changes. Such leadership facilitated long-range planning and eased the implementation of the federal law.

In the two rural districts where the special education directors were in individual LEAs, these administrators had to fight for their share of the school district budget based on their own authority alone--no central office could be relied upon for "clout. " These administrators relied on the "one-person show" style of leadership (i.e., these people were synonymous with special education to most people in the community). Although these leaders were strong advocates for handicapped children, they often had a limited view of the responsibility of the schools which hindered their ability to be proactive long-range planners. Also, there was nothing to prevent their personal biases from influencing what services would be provided. Moreover, these special education directors played a dominant role that made it difficult to delegate various responsibilities to school administrators. That is, principals continued to play their traditional roles, assuming the special education staff would continue to play theirs, and resisted taking a more active role in special education matters in their schools.

Proximity to Human Services Agencies and Universities

Proximity to human services agencies and universities which can be of great value to special education, varied across the rural districts. For example, one remote site had good access to various related services because of its proximity to a state rehabilitation facility and a university. It was more difficult for another rural LEA to provide certain related services to its handicapped children because it was too distant from such necessary services.

External Factors

Factors external to the district also influenced the level of implementation and progress over time in the rural areas. For example, state law and the movement toward deinstitutionalization were important. A comprehensive state special education law in one state required LEAs to implement specific procedures and instructional practices. The rural district we visited in this state was forced to adopt these new procedures and practices according to a state timetable. In some instances, local administrators in this rural area thought that they were being pushed too fast. The capacity of a rural district to deal with the deinstitutionalization issue was tested in only one of the rural LEAs that SRI visited. However, effective administrative leadership in that district facilitated the gradual inclusion of previously institutionalized handicapped children within the special education service delivery system of the LEA.

REFERENCES

Berman, P., and M. W. McLaughlin, "Federal Programs Supporting Educational Change, Volume VIII: Implementing and Sustaining Innovations," The Rand Corporation, R-1589/8-HEW, Santa Monica, California (May 1978).

Hall, G. E., and S. F. Loucks, "A Developmental Model for Determining Whether the Treatment is Actually Implemented," American Educational Research Journal, Volume 14, No. 3, pp. 263-276 (Summer 1977).

Helge, Doris, "A National Comparative Study Regarding Rural Special Education Delivery Systems Before and After Passage of PL 94-142," Murray State University, Murray, Kentucky (1980).

Knapp, M. S., M. S. Stearns, B. J. Turnbull, J. L. David, and S. M. Peterson, "Cumulative Effects of Federal Education Policies on Schools and Districts," SRI International, Menlo Park, California (January 1983).

Stearns, M. S., D. Greene, and J. L. David, "Local Implementation of PL 94-142: First Year Report of a Longitudinal Study," SRI International, Menlo Park, California (April 1980).

Wright, A. R., R. A. Cooperstein, E. G. Renneker, and C. Padilla, "Local Implementation of PL 94-142: Final Report of a Longitudinal Study," SRI International, Menlo Park, California (December 1982).

Problems and Strategies Regarding Regionalizing Service Delivery: Educational Collaboratives In Rural America

Doris Helge, Ph.D.
Director
National Rural Research Project
Murray State University
Murray, KY 42071

February, 1984

PROBLEMS AND STRATEGIES REGARDING REGIONALIZING SERVICE DELIVERY: EDUCATIONAL COLLABORATIVES IN RURAL AMERICA

Doris Helge, Ph.D.
Director
National Rural Research Project
Murray State University
Murray, KY 42071

February, 1984

Copyright, 1984

Prepared for

Special Education in Rural America, a project supported by Research Contract No. 400-81-0017 from the National Institute of Education to the Department of Special Education, The University of Kansas.

"The work upon which this publication is based was performed pursuant to Contract No. 400-81-0017 of the National Institute of Education. It does not, however, necessarily reflect the views of that Agency."

PREFACE

This report resulted from a request to review studies of the National Rural Project (NRP) to determine the impact of educational collaboratives on rural special education. Raw data and previously reported results from the following NRP studies were reviewed.

> 1979-81 National Rural Project study of problems and successes in implementing PL 94-142 in rural school systems. This study involved 43 special education cooperatives and 32 LEAs in 21 states.
>
> 1980 National Rural Project National Comparative Study of Rural Service Delivery Systems Before and After Implementation of PL 94-142. This study involved 43 special education cooperatives and 32 LEAs in 17 states.
>
> 1981 National Rural Project Survey of National Rural Special Education Leadership Conference participants regarding primary service problems in their rural districts/cooperatives. This study involved 56 rural special education administrators.
>
> 1982 American Council on Rural Special Education (ACRES) Survey of National Rural Special Education Conference participants regarding primary service delivery problems in their districts/ cooperatives. This study involved 60 rural special education administrators.
>
> 1983 National Rural Project Study of 200 rural special education administrators in 200 geographically representative rural locations (4 per each of 50 states) regarding rural special education problems and successful strategies of serving students with disabilities.

TABLE OF CONTENTS

Page

I. INTRODUCTION.................................... 1

II. TYPES OF EDUCATIONAL COLLABORATIVES.................. 6
  1. State-mandated special district systems and education service agencies...................... 7
  2. Cooperatives formed by local district initiation................................. 7
  3. Regional or decentralized state education agency systems................................. 7
  4. Other inter-organizational structures.......... 8

III. VARIATIONS WITHIN COLLABORATIVE STRUCTURES........... 9

IV. BENEFITS OF COLLABORATIVES FOR RURAL SPECIAL EDUCATION...................................... 11
  1. Improved Cost Efficiency Ratios................. 12
  2. Maintenance of a Sense of Local Autonomy........ 13
  3. Facilitation of Compliance with Federal Special Education Mandates...................... 13
  4. Access to Program and Service Specialists....... 14
  5. Facilitation of Teacher Retention.............. 14
  6. Enhancement of Parent Involvement.............. 14
  7. Shared Information for Better Planning.......... 14
  8. Non-Threatening Information Exchange............ 15
  9. Benefits of Temporary Systems.................. 15
  10. Assessment and Reallocation of Resources........ 15
  11. By Products of Conflict Resolution............. 15

V. PROBLEMS RELATED TO REGIONAL SERVICE DELIVERY STRUCTURES...................................... 17
  1. Goal Displacement.............................. 19
  2. Cumbersome Bureaucratic and Political Structures...................................... 19
  3. Reduced Local District Autonomy................. 19
  4. Inadequate District Commitment to Special Education Programs............................. 19
  5. Inappropriate Determination of Services......... 21
  6. Inadequate Relationships Between the Collaborative and Each District................. 21
  7. Difficulties with Staff Supervision............ 21
  8. Personnel Insecurity and Dissatisfaction........ 22
  9. Personnel Attrition............................ 22
  10. Difficulties Involving Parents................. 23
  11. Conflicts Between Local District Members of a Collaborative............................. 23
  12. Low District Priorities Regarding Special Education Services Offered by the Collaborative.................................. 24
  13. Misconceptions Regarding the Realities of Interagency Collaboration...................... 24
  14. Fiscal Inequities.............................. 24

Page

    15. Difficulties Posed by Administrative Turnover.................................... 25
    16. Conflicting Regulatory/Monitoring and Service Roles.................................... 25
    17. Inadequacies of the Collaborative Model for Some Instances of Geographic and Cultural Isolation.................................... 25

VI. SUMMARY.. 26

VII. SUCCESSFUL STRATEGIES.................................. 34
    1. Legislative/Regulatory Agency Support........... 36
    2. Appropriate Geographic Scope.................... 36
    3. Governing Structure Facilitating Achievement of Collaborative's Goals and Objectives......... 36
    4. Allowance for Divergent Goals of Each Unit of the Collaborative.......................... 37
    5. Clear Procedures for Service Delivery........... 37
    6. Equitable Service Delivery Sytems.............. 38
    7. Appropriate Lines of Staff Accountability....... 38
    8. Effective Planning Based on Evaluation Data..... 39
    9. Effective Communication Systems................. 39
    10. Local District Responsibility for Special Education Services.............................. 40
    11. Appropriate Involvement of the Public in Decision Making.................................. 40
    12. Creation of Local Support for Change........... 41
    13. Collaboration with Agencies External to Collaborative.................................. 41
    14. Realistic and Effective Intra-agency Collaboration.................................. 42
    15. Facilitation of Parent Involvement.............. 42
    16. Emphasis on Retention of Qualified Personnel.... 42
    17. Comprehensive Staff Development Programs........ 43
    18. Creative Uses of Advanced Technologies.......... 44

VIII. CONCLUSIONS.. 45

IX. BIBLIOGRAPHY... 46

LIST OF TABLES

Page

TABLE I: MAJOR BENEFITS OF REGIONAL SPECIAL EDUCATION SERVICE DELIVERY.................................. 12

TABLE II: PROBLEMS FACILITATED OR EXACERBATED BY REGIONAL SERVICE DELIVERY STRUCTURES............ 18

TABLE III: STRATEGIES FOR SUCCESSFUL REGIONAL SERVICE DELIVERY.. 35

BEST COPY AVAILABLE

LIST OF FIGURES

Page

FIGURE 1: DIVERGENT LEVELS OF EMPHASIS..................... 5

FIGURE 2: RELATIONSHIP OF LOCAL AUTONOMY, INPUT AND COMMITMENT TO PERCEIVED BENEFITS OF COLLABORATION.................................... 27

FIGURE 3: EFFECTS OF MEMBERSHIP IN A COLLABORATIVE ON A LOCAL DISTRICT'S RESISTANCE TO CHANGE.......... 29

FIGURE 4: EFFECTS OF REGIONAL SERVICE DELIVERY ON PARENT INVOLVEMENT............................... 31

FIGURE 5: EFFECTS OF COLLABORATIVE STRUCTURE ON TEACHER RETENTION VARIABLE............................... 33

PROBLEMS AND STRATEGIES REGARDING REGIONALIZING SERVICE DELIVERY: EDUCATIONAL COLLABORATIVES IN RURAL AMERICA

INTRODUCTION

Educational collaboratives are designed to enhance or provide regional educational services. Organizational arrangements range from informal agreements between two or more local school districts to state education agency-imposed regional structures with regulatory or service orientations.

Collaboratives of all types offer opportunities for cost savings via shared staff, programs, media centers, computer services, staff development programs, personnel, and other resources. Regional structures provide local rural districts the benefits of joining together for services while maintaining the advantages of remaining small. This is especially true when a collaborative structure is designed to include a great deal of local district autonomy regarding how services are provided.

In spite of a relative lack of research regarding educational collaboratives, regional structures such as cooperatives and intermediate units have been steadily increasing in numbers and functions. Primary impetuses have included desires for efficient service delivery (economies of scale or the desire to combat inflation), the desire to enhance effectiveness by pooling single district resources for common purposes, pressures from parents and state education agencies, and federal incentives.

With regard to rural special education, the primary federal regulation credited with promoting the establishment of collaboratives has been the requirement of Public Law 94-142 that any local district with too few eligible children to qualify for a $7,500 allocation of federal funds would receive no direct pass-through funds from their state education agency. This encouraged numerous small rural districts to form or join special education cooperatives so that a true continuum of services could exist and students with low-incidence disabilities could receive appropriate services.

Activities designed to provide appropriate education for students with disabilities have fostered cooperation among smaller school districts. Even before enactment of PL 94-142, a number of states foresaw the need for mandatory special education legislation and collected prevalence data regarding students with disabilities. These states found that a student population of 15,000 or more is required to provide cost-effective categorical programs in most special areas. Some programs, such as those for deaf-blind students, require an even larger student population. As a result, these states established cooperative arrangements, including the Regional Education Service Agencies of Iowa, the Joint Agreements of Illinois, and the BOCES of New York.

Additionally, voluntary collaboration is becoming more common. For example, a study (Helge, 1980) of rural school administrators indicated that rural school districts that were not required to join or form a cooperative (i.e., the district had a sufficient number of handicapped students that it was entitled to request $7,500) were electing to do so. Respondents reported that district administrators felt that cooperative administrative structures would enable them to better serve their students with disabilities. (Some districts shared as few as one educator or specialist such as an itinerant speech therapist.)

While respondents in 61% of the states involved in an 1980 NRP survey indicated that their states mandated interdistrict collaboration, only 38% reported that positive incentives for collaboration were provided by their states. Instead, 73% of the respondents reported that their primary incentive was their "desire to enhance service delivery." Less than one-third (27%) reported that their incentives stemmed from the $7,500 mandate of PL 94-142.

Emerging trends of voluntary collaboration (Naisbitt, 1983, Howe, 1981, Helge, 1980) and service vs. regulatory orientations (Howe, 1981) have been identified.

Thus, in this decade, rural special education programs are frequently enacted in unique regional organizational environments. Traditional patterns of school or district level educational assessment, planning, service delivery, and monitoring are being replaced. Decisions regarding rural students are more often being made by organizations at higher levels, and the ramifications have been both positive and negative.

In its simplest form, a collaborative stems from an informal agreement between two or more school districts to cooperatively accomplish one or more tasks. Regional structures can also involve cooperative agreements between districts and a decentralized or intermediate state education agency. Educational collaboratives are organized to assess needs, plan, implement, or evaluate student services. As a regional administrative structure becomes more formalized and organized, with its own staff, its operations tend to become more removed from the control of its constituents and member districts.

This is because of the typical differentiation of the roles of local school districts from those of regional collaboratives. A local school district's primary responsibilities are to deliver programs and services directly to students. A regional structure typically is primarily responsible for coordination and delivery of services to member districts and staffs. At the third level, the state department is primarily responsible for policymaking, enforcement of statutes and regulations, and relevant data gathering. These three levels of emphasis are depicted in Figure 1 below.

DIVERGENT LEVELS OF EMPHASIS

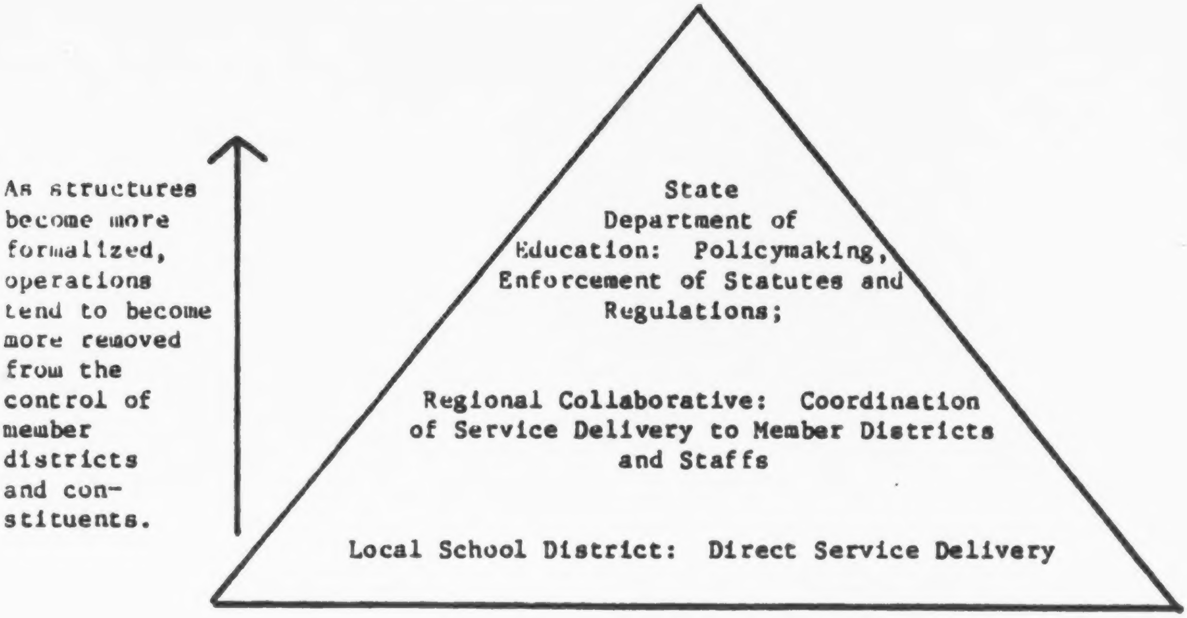

As structures become more formalized, operations tend to become more removed from the control of member districts and constituents.
State Department of Education: Policymaking, Enforcement of Statutes and Regulations;
Regional Collaborative: Coordination of Service Delivery to Member Districts and Staffs
Local School District: Direct Service Delivery

Figure 1

TYPES OF EDUCATIONAL COLLABORATIVES

The organizational structures of collaboratives vary from state-mandated special district systems with massive funding and large special education staffs to agreements between two or more local education agencies to share particular services.

Collaboratives are best categorized by function because the terminology used by various states to describe regional structures is inconsistent. Major functional variations regard the scope of program involvement, governance, fiscal bases, and organizational structures. Some collaboratives serve only rural areas and some serve districts of any size and area in their region. The foci of collaboratives varies from regulatory to service provision, with some emphasizing the elimination of district paperwork and even furnishing grantwriters for local districts.

The predominant types of collaboratives include:

1. state-mandated special district systems and education service agencies
2. cooperatives formed by the initiation of local districts
3. regional or decentralized state education agency systems providing no direct services
4. other inter-organizational structures.

Most collaboratives are relatively new developments that came into existence during the past two decades. Well-known exceptions are the pioneering New York BOCES. Almost all states have collaboratives of some kind and some states have exerted strong leadership, practically mandating some of their districts to become involved in cooperative arrangements. Although all types of collaboratives can serve urban and rural districts, their impact is probably greater in rural areas because rural schools typically have fewer resources to meet educational needs.

Each primary type of collaborative structure is briefly described below.

1. State-mandated special district systems and education service agencies.

The primary orientation of these collaboratives is service delivery. Examples include the New York BOCES and intermediate education units such as those in Pennsylvania. A study by Mack and Stephens (1979) indicated that special district service agencies such as the state-mandated systems in New York and Pennsylvania have made more significant contributions of programs and services to public school districts than have most regionalized and cooperative state education agency networks (decentralized state education agencies). Mack and Stephens (1979) attributed that to the fact that most special districts have a more comprehensive, faster-growing staff than do regionalized and cooperative education service agency networks.

2. Cooperatives formed by local district initiation.

Agreements are made in such collaboratives for two or more districts to share services to a greater or lesser degree or to contract for instruction for an individual student. (Examples include the special education cooperatives in Kansas and Arkansas.) Some cooperatives have a stable administrative district and some rotate this district on a set or periodic basis.

This classification includes cooperatives that are totally voluntary and those that are encouraged because of the requirement of PL 94-142 that districts must apply for a minimum of $7,500 in funds for their handicapped programs. Some states formed cooperatives only because of this requirement and had no services for some types of disabilities previous to the formation of such cooperatives. In fact, cooperatives with special education as a focus have mushroomed since the 1975 passage of PL 94-142. Cooperative structures vary tremendously in governance systems and in geographic scope, but most were designed to ameliorate the difficulties of providing a continuum of services in rural schools. Of particular concern were problems serving students with low-incidence disabilities.

3. Regional or decentralized state education agency systems.

This classification refers to decentralized extensions of state education agencies that do not provide direct services. An example is the educational collaboratives of the state of Massachusetts.

4. Other inter-organizational structures.

> These include: (a) districts having contracts with private or community agencies, (b) cooperatives having agreements with other cooperatives, (c) cooperatives and single districts having service agreements, (d) inter-state collaboratives including those structured through regional resource centers or cross-funded federal-state structures such as facets of tribal service agreements of the Bureau of Indian Affairs, (e) other unique arrangements designed to provide services to extremely remote areas such as recently organized state-funded limited purpose regional resource centers in Arkansas or Alaska, and (f) models with overlapping interdisciplinary approaches for service delivery which encompass interdisciplinary teams at local and state levels. The latter type is primarily used in predominantly rural states including Vermont.
>
> NRP research and literature reviews indicated that a majority of these types of collaboratives were issue or project specific.

Most of the four primary collaboratives described above were not specifically designed to serve students with disabilities. However, some types such as the Texas education service districts, were designed with rural and regional service needs in mind. A study (Mack and Stephens, 1979) of educational collaboratives (which was not limited to organizations serving rural areas) indicated that special education services were a universal priority of collaboratives. In fact, this study determined that over one-third of the expenditures of all of the systems they studied were related to special education. Special education staff constituted nearly one-half of the total staff for all agencies. (Mack and Stephens, 1979.)

There are important variations in the types and methods of services provided, based on the type of organizational unit. State-established special districts tend to provide the greatest range of services and employ the largest staffs. Decentralized state education agencies provide no direct services to children. Cooperatives tend to use a combination of shared local programs and directly sponsored services.

VARIATIONS WITHIN COLLABORATIVE STRUCTURES

Intermediate education units are sometimes state formed and financed and sometimes created and supported by local and regional services of specialists, to procure help in curriculum matters and to gain access to large media centers stocked with modern equipment and software. The regulatory powers of the intermediate units are contingent upon their formation. If the collaborative is state initiated, it typically functions as an arm of state government working with the schools. If it was locally formed, it functions primarily as a service unit.

Special education cooperatives and the regional structures depicted in No. 4 above are the only types that have been organized specifically to meet special education services needs. However, many special education cooperatives have special education administrators with no training in special education.

The degree of the organizational structure of collaboratives also varies tremendously. For example, the first regional administrative structure in the state of Maine designed to focus on special education programs was initiated in the 1977-78 academic year. No special legislation was required. A regional special education director and associated staff were not employed. Thus almost all monies were used to directly serve the targeted handicapped student population (Shulman and Doughty, 1983.)

Some states organize their cooperatives by student population. For example, one state required a basic student population of 15,000; thus cooperatives in the state involved divergent numbers of counties. Organizational structures and requirements sometimes vary significantly

BEST COPY AVAILABLE

BEST COPY AVAILABLE

within a given state. This is particularly true in states in which districts have total freedom of choice concerning joining a cooperative.

BENEFITS OF COLLABORATIVES FOR RURAL SPECIAL EDUCATION

Participants in the federally-sponsored Rural Conversations Seminar (Jacobson, 1979) concluded that various forms of collaboratives were demonstrating potential for delivering services to rural schools. The conference report stated that this was particularly true regarding high cost support services for populations such as students with disabilities.

For a variety of reasons and incentives, collaboratives are formed or accessed with the view that small rural districts will be better able to offer a true continuum of services. This is especially true regarding programming for students who have disabilities of low incidence, a program area NRP researchers were told was "underdeveloped." (Helge, 1981.)

Table I depicts the advantages of regional special education service delivery identified in NRP research.

BEST COPY AVAILABLE

Table I

MAJOR BENEFITS OF REGIONAL SPECIAL EDUCATION SERVICE DELIVERY

Improved Cost Efficiency Ratios

Maintenance of a Sense of Local Autonomy

Facilitation of Compliance with Federal
Special Education Mandates

Access to Program and Service Specialists

Facilitation of Teacher Retention

Enhancement of Parent Involvement

Shared Information for Better Planning

Non-Threatening Information Exchange

Benefits of Temporary Systems

Assessment and Reallocation of Resources

By Products of Conflict Resolution

Each major benefit that has been identified is described below.

1. Improved Cost Efficiency Ratios.

Rural schools have generic difficulties of providing economical specialized programs in small school units. NRP research has consistently identified "funding inadequacies" as a significant problem for rural local districts. In fact, according to 74% of those sampled in a 1983 survey of 200 geographically representative rural special education administrators, funding inadequacies were a serious problem for their rural district. (Helge, 1984.) Furthermore, a second analysis of data collected for 1978-983 NRP studies indicated that smaller districts tended to have the greatest funding problems. Respondents reported that this was because of the expenses involved in transportation, obtaining services of specialists, etc.

The cost per unit of specialized services is higher in rural areas than in urban areas due to less professional resources available, transportation barriers, and other attributes of rural areas. (Offices of Rural and Human Development, 1975; Rosenfeld, 1981.) A 1979 study of the National School Boards Association indicated that small school dis-

BEST COPY AVAILABLE

tricts had experienced the sharpest increases in special education costs of all U.S. districts (*Education of the Handicapped*, June 20, 1979).

Estimates of populations bases required for a rural district to cost-efficiently provide a continuum of special education services, including segregated special education classes, have ranged as high as 50,000 students (Isenberg, 1970, Kidd, 1970). Only 50% of all U.S. school districts can meet the 8,000-10,000 population criterion established by Kohl and Marro (1971). In fact, nearly 76% of the school districts in the U.S. have total pupil enrollments under 2,500. (Barker, 1983.) Due to the significant barriers posed by the geographic nature or remoteness of many of these schools, (e.g., isolation caused by mountains, deserts, and islands), unique service delivery models are required so that service delivery becomes more affordable or approaches cost-efficiency.

Respondents in NRP studies from 1978-83 have indicated that collaboratives facilitate cost savings because of the opportunities to share staff, programs, inservice, and other resources. Additionally, respondents also reported that collaboratives facilitate the design of cost-efficient strategies and systems when individuals from various districts openly discuss ineffective strategies. This sharing contributes to savings and to the redistribution of funds to more effective programs or strategies.

2. Maintenance of a Sense of Local Autonomy.

Educational collaboratives have been fairly consistently promulgated as vehicles through which human, technical, and material resources could be provided without school consolidation (Sher, 1977, 1978). In fact, regional structures offer acceptable compromises between the need for consolidation to efficiently provide services and the preference for autonomy. Because each district stays in tact, local automony is not totally surrendered, and the values of smallness are therefore not lost. Depending on the state structure, school districts can obtain needed services without large additional expenditures (e.g., where the state is the chief source of education service agency operating funds). Usually, the local districts have influence, at least to some degree, on decisions concerning service provisions. Collaboratives can also maintain a service orientation rather than overemphasizing regulatory functions.

3. Facilitation of Compliance with Federal Special Education Mandates.

A study by Weber and Rockoff (1980) related compliance with the provisions of PL 94-142 to the total number of students enrolled in a school district. The investigators stated that larger districts and collaboratives could be more flexible and adapt as needed to meet PL 94-142 mandates. Study results regarding compliance are indirectly related to district membership in collaboratives. Similar respondents in NRP studies, including the national study comparing rural special education services before and after implementation of PL 94-142, (Helge, 1980) reported greater compliance with federal special education mandates after their districts became involved with special education cooperatives.

4. Access to Program and Service Specialists.

Regional structures enable smaller school systems to enjoy some of the same educational advantages of their larger counterparts. This is particularly true when the smaller school systems are geographically isolated. Thus staff report that collaboratives reduce educational inequities otherwise borne by the students and teaching staff of small rural areas. This is most obvious in increased services to students with low-incidence disabilities.

A well-staffed collaborative may supply direct services to students (e.g., actually teaching students with disabilities) or indirect services like inservice training, curriculum planning, achievement testing, etc. Collaboratives help overcome the rural problem of too few support programs and restricted curricula by linking the rural district/service providers with expertise, technology, and training often available only in areas with larger populations.

5. Facilitation of Teacher Retention.

Although staff recruitment and retention remain two of the foremost problems in rural special education (experienced by 66% and 64% respectively, of those surveyed in a 1983 NRP survey (Helge, 1984), teacher retention can be facilitated by a regional delivery system. Teachers who receive assistance from regional personnel are more likely to remain in their positions than those in single districts who are expected to be "all things to all people," providing most services alone. (Fritz, 1982, Helge, 1983.)

6. Enhancement of Parent Involvement.

Parent involvement can be facilitated by membership in a collaborative. It is possible for some students to be served in their local district who otherwise would have to be sent outside of the district or even placed in a residential center. Many collaboratives provide a structure involving frequent home visitations in which regional specialists work directly with parents in implementing a student's IEP.

7. Shared Information for Better Planning.

BEST COPY AVAILABLE

Collaboration between personnel of cooperating districts allows representatives of local rural areas to survey more options and to select choices to be reviewed by local populations. Typically, small size, less formal structure, and less long-range planning characterize many rural programs. A small staff or school board many reflect "consensus" by casual agreement with an acknowledged leader's opinion. If collaboration can be effected with a planning project or agency that serves a small district that effectively uses long-range planning, another district in the collaborative may also recognize the value of planning and the possible use of regional personnel for assistance.

8. Non-Threatening Information Exchange.

Collaboration between districts with similar special projects or needs allows the exchange of information in a non-threatening manner that may reveal deficiencies and problems to be addressed. As districts feel comfortable sharing failures as well as successes, other districts can benefit, omitting repetition of errors. Agency collaboration typically results in the indirect sharing of information about attempted programs whose results failed to meet expectations. This sharing may contribute to substantial cost savings.

9. Benefits of Temporary Systems.

Formal collaboration may initiate the organization of "ad hoc cooperatives" for special projects. When a task is completed, the ad hoc cooperative can disband. Leadership external to a district may provide new motivations within a district while it is assisting with new models or procedures for service delivery. Having facilitated new indigenous rural leadership, temporary assistance providers can then go elsewhere.

10. Assessment and Reallocation of Resources.

A conscious effort to collaborate may make organizations cognizant of the saturation of resources, approaches, or programs in a given area. Such knowledge may prompt redistribution or reapportionment so that unserved areas may be reached. Monies saved from questionable information programs can be applied elsewhere. This will also assist in beginning to address the inequities of resources among various units of the collaborative.

11. By Products of Conflict Resolution.

Conflict is endemic to interagency collaboration, particularly among districts having histories of local autonomy. Confrontation and resolution of differences of opinion are essential if a collaborative is to function. Conflict resolution has been reported as responsible for establishing interpersonal bonds across local district boundaries. These bonds have been used to facilitate support for new program development activities.

PROBLEMS RELATED TO REGIONAL SRVICE DELIVERY STRUCTURES

While regionalized service delivery has allowed a greater range of special education and related services to be provided with fewer personnel than would be the case when offered by individual districts, collaboratives have definitely not offered panaceas. Regionalized special education has often resulted in arguments over the locus of decisonmaking control, the location of the unit, personnel choices, loss of community pride and ownership in programs, and higher transportation costs.

Centralized services have frequently amplified bussing problems. Savings accrued from serving larger numbers of students have sometimes been negated by greater costs of transportation, more drivers and fuel, and faster bus depreciation.

An analysis of NRP studies led to the identification of a number of concerns about the operation of collaboratives. These concerns are depicted in Table II below.

Table II

PROBLEMS FACILITATED OR EXACERBATED BY REGIONAL SERVICE DELIVERY STRUCTURES

Goal Displacement

Cumbersome Bureaucratic and Political Structures

Reduced Local District Autonomy

Inadequate District Commitment to Special Education Programs

Inappropriate Determinations of Services

Inadequate Relationships Between the Collaborative and Each District

Difficulties With Staff Supervision

Personnel Insecurity and Dissatisfaction

Personnel Attrition

Difficulties Involving Parents

Conflicts Between Local District Members of a Collaborative

Low District Priorities Regarding Special Education Services Offered by the Collaborative

Misconceptions Regarding the Realities of Interagency Collboration

Fiscal Inequities

Difficulties Posed by Administrative Turnover

Conflicting Regulatory/Monitoring and Service Roles

Inadequacies of the Collaborative Model for Some Instances of Geographic and Cultural Isolation

Each major concern is briefly discussed below.

1. Goal Displacement.

Goal displacement occurs when an emphasis on cost efficiency becomes the overriding goal of an administrative structure and individual child needs are placed at a lower priority level. Goal displacement also occurs when regulatory functions take precedence over the service orientation of the collaborative. A caveat seems to be necessary to maintain foci on the true purposes of the collaborative.

2. Cumbersome Bureaucratic and Political Structures.

Bureaucratic layers and political structures designed with the intention of facilitating services can isolate the student needing services from them and unnecessarily involve service providers in political battles. The existence of multiple governing boards (within each LEA and for the collaborative as a whole) is usually cumbersome. For example, planning is difficult in structures in which budget figures are not available until just prior to the new year because each year requires new decisions at the LEA level regarding the extent of involvement for the new year. This kind of operation inhibits recruitment of new staff and planning in general.

Politics intervene in some collaboratives to the extent that some "cooperatives" involved in NRP studies did not entail sharing of programs, services, or personnel. Districts had withdrawn from special education cooperatives in some states because of dissatisfaction with service delivery.

3. Reduced Local District Autonomy.

Many rural districts found regional service delivery threatening to the standard of local autonomy as regional decision-making frequently took place without the advice of district officials and parents. Typically, administrators of the largest school districts in a non-volundary collaborative are the most dissatisfied because of their desires for the district to maintain control over their own special education personnel. Administrators frequently argue that this violates good management practices of decentralization and advocate that the collaborative is more appropriate for smaller districts with insufficient numbers of children to hire specialized personnel.

4. Inadequate District Commitment to Special Education Programs.

Because most collaboratives were initiated to address unmet needs and provide specialized services, they are not typically an integral part of the entire educational system.

This limited scope of program involvement places the collaborative and its leadership personnel apart from the other major business of the regular school system. Thus, regional personnel and the students they serve are frequently accorded "second class citizenship." Obviously, this can negatively affect mainstreaming efforts.

Many regional staff hired by collaboratives were concerned that district personnel were abrogating their responsibilities toward the handicapped by allocating all responsibility for handicapped students to the regional structure. They felt a need for better education and commitment of district personnel in understanding their roles in complying with PL 94-142. Some respondents reported inappropriate dependence upon regional specialists and staff. Some stated that a lack of local district involvement in special education programs was contributing to them serving as a "dumping ground" for students with problems. Many collaborative staff reported that districts expected to simply pay a contracted fee which would free the district from further responsibility for service delivery. Respondents stated that such attitudes inhibited mainstreaming of handicapped students.

Respondents also stated that local "ownership" and commitment were destroyed in instances in which an itinerant staff member (e.g., a physical therapist) hired by the collaborative was the only person legally allowed to deliver certain services.

According to Howe, regional agencies that serve large and small districts can actually inhibit integration of special education. Although individual large districts hire their own special education personnel and some special education personnel are hired by the smaller districts, most of the regional service agency personnel are specialized ancillary personnel (e.g., school psychologists, speech and language clinicians, school social workers, consultants, audiologists, and itinerant teachers). Coordinators for the larger major functions provided by the regional service agency are not instructional programs as much as they are responsible for determining special education eligibility, monitoring special education programs, providing consultation to districts, and directly administering some of the low prevalence programs.

Such factors contribute to difficulties identifying the person responsible for service delivery. Local district resource room personnel frequently feel that they are incapable of serving or mainstreaming severely disabled students who are usually served by the regional specialists. Thus, local services are frequently inappropriately confined to those for mildly and moderately disabled students.

5. Inappropriate Determinations of Services.

The separate fiscal status of districts and the collaborative can cause instability. This is particularly true when the collaborative requires a district to purchase services. The types of services offered, their quality, scheduling, or the program emphasis may be determined after considering financial needs rather than those of students. Likewise, determination of the location of services may be based on politics or availability of space vs. the most appropriate location for students with disabilities.

6. Inadequate Relationships Between the Collaborative and Each District.

Careful consideration must be given to establishing effective relationships between the collaborative and each district in regular as well as special education matters. This includes lines of accountability for all personnel hired by the collaborative to work with some or all districts involved. For example, it is wise to discuss guidelines for dividing service time for collaborative personnel among various duties and districts at an early stage. Some collaboratives find it effective to allocate district costs for the collaborative staff on the basis of the amount of time spent in service delivery in a particular district, and other districts prefer that staff be paid on an equally split basis, no matter where services were delivered. Such operational philosophies are best decided when the structure is initiated.

Staff of districts that were part of collaboratives frequently expressed problems determining which staff member/district is responsible for assisting a particular student. A common complaint was that informal procedures frequently differed dramatically from those depicted by the formal organizational chart.

7. Difficulties with Staff Supervision.

Many collaborative personnel are concerned with the abilities of shared personnel to cover vast distances effectively, such as extremes of 24,000 square miles and entire islands. Many special education supervisory staff hired by the collaboratives are unable to hire, advise, or supervise special educators. Many special education personnel become accountable to the building principal once they enter that individual's domain.

Supervision of services is frequently based on the least expensive alternative. Supervisors are sometimes identified after determining who is available or politically acceptable. Under such circumstances, it is difficult to implement fair evaluation procedures.

8. Personnel Insecurity and Dissatisfaction.

Special education administrators and itinerant staff employed by regional units tend to feel less professional security than those hired by single districts. Role ambiguity is particularly problemmatic. Problems range from determining which specialist has a needed area of expertise to delineating lines of responsibility.

The roles of itinerant staff appear to be the least understood. Many regular educators stated that they were envious of "the time off" that itinerant staff had when traveling vast distances in inclement weather. Itinerants reported working in ill-equipped regional areas, in boiler rooms, and in other facilities reserved for the "part-time staff member."

A majority of itinerant staff stated that non-itinerant staff did not fully understand needs that itinerants have for time off, answering telephone calls, writing and proofing reports, consulting with other team members, attending staff meetings, and conducting other atypical responsibilities. Many specialists clearly felt that they alone understood their roles and had no one within their district/collaborative with whom to confide their frustrations.

Because itinerants are not seen as part of any schools or part of the collaborative management team, they experience no control over decisions about their work. Because of their separation from the communities in which they work, they frequently do not know how to approach the local community power and communication systems and are poorly accepted. The supervisor in charge of evaluating their performance may be located days away from their work site, and they may have differences of opinion with the building principal. Differences in salary levels between district or regional staff or between involved private and public schools are often points of contention.

Some states will not pay itinerants for the time they spend in traveling. Itinerants working in culturally different villages frequently report dissatisfactions such as the requirements to eat indigenous foods. Many itinerant staff report no available accomodations other than housing in the homes of students. Precious travel time is frequently wasted when parents who are not interested in working with outsiders do not attend scheduled conferences.

9. Personnel Attrition

Attrition of qualified itinerant staff and other specialists is a chronic problem related to the staff dissatisfaction reported above. (Helge, 1984, 1981).

Regional intinerants receive less reinforcement on the job. However, special education teachers in cooperatives are more likely to remain in their positions than teachers in districts which must provide most of their own services. (Fritz, 1982, Helge, 1981).

Many regional service models evolved because of transportation difficulties such as poor roads, climatic difficulties, flooding, and travel time constraints. In fact, one Montana cooperative was designed for the purpose of "enhancing staff morale and improving staff retention." However, travel constraints remain a problem for the itinerant and contribute to staff attrition.

10. Difficulties Involving Parents.

Regional structures can facilitate involvement by allowing more students with low-incidence disabilities to be served in a regional (vs. residential) school program. However, when the regional programs are located great distances from the students' homes and regular home visits are not a specific responsibility of a staff member, collaboratives can actually decrease parent involvement. In fact, parent involvement and communication becomes more difficult as services are removed further from the local school building. Situations requiring child travel to a centralized service facility inadvertently exclude many parents from participation with the child's program or teacher. Some districts in widespread collaboratives actually lack a real sense of "community."

Programs that are not designed with local norms and cultures in mind also inhibit parent involvement. Many rural parents are wary of "outsiders" (e.g., itinerant staff) who appear occassionally for short periods of time to instruct their children or recommend actions for parents.

11. Conflicts Between Local District Members of a Collaborative.

The quality of services is often inconsistent across units of a collaborative because of variations in staff competency and staff development programs.

Differences in standards or requirements between districts, private schools, or agencies also threaten consistency. Inconsistency of communications from federal and state levels to various districts can cause differences of opinion regarding actions that should be taken. Divergent guidelines and levels of local commitment to interagency agreements or the funding of non-public school placements, differences in salary levels of district and regional staff or between involved private and public schools, or differences of opinion regarding funding and services criteria and service eligiblity definitions can result in inflexible or conflicting standards and violations of PL 94-142 requirements.

Hidden agendas are prolific in collaboratives because each district feels ultimately responsible to his/her local community. True change across a collaborative is difficult in the midst of competing local priorities.

Sometimes local school boards resist cooperation because of personalities involved, sports competitions, statewide or intra-collaborative offices/favors being sought, etc. If districts become polarized, cooperative projects may be doomed to failure because acceptance by one group assures rejection by the other.

12. Low District Priorities Regarding Special Education Services Offered by the Collaborative

It is frequently difficult to maintain stable service delivery sites in buildings or districts. District administrators frequently require the cooperative's special education programs to physically move, even to another district within the cooperative. This further inhibits integration of handicapped students into the mainstream of the activities of member districts.

13. Misconceptions Regarding the Realities of Interagency Collaboration.

According to Baker (1980), traditional values of interagency relationships (e.g., high consensus levels, voluntary formation, and equal exchanges of resources) may facilitate "antagonistic cooperation" and districts may neglect service delivery while battling among themselves.

14. Fiscal Inequities.

Some costs, such as transportation to centralized programs, can actually increase via regional programs.

When the collaborative is funded (by the state department or by districts) on the basis of the types of personnel delivering services, vs. the types of services offered, no allowances are made for the extra costs of serving students with multiple needs. Thus, the high costs associated with extra transportation, tuition for private placement, etc., are not met in an equitable fashion.

When services depend on the amount of PL 94-142 flow-through money contributed to the collaborative, the smallest districts, sometimes the most remote and needing services the most, suffer regarding the amount of services received. Collaboratives that organize so that services will be delivered on a first come first served basis foster service inequities. Such a system also encourages overreferral.

15. Difficulties Posed By Administrative Turnover.

Because rural systems tend to favor informal agreements and informal ways of implementating agreements, leadership turnover frequently inhibits service delivery.

16. Conflicting Regulatory/Monitoring and Service Roles.

Collaboratives that are assigned dual roles (providing technical assistance as well as monitoring) by state education agencies are placed in positions of automatic conflict. While such an arrangement is easier for a state department (e.g. communicating to one agent vs. many local district personnel), participating districts typically view directors of such collaboratives as "agents of the state," rather than of the collaborative or district.

17. Inadequacies of the Collaborative Model for Some Instances of Geographic and Cultural Isolation.

The collaborative model is sometimes of little benefit. Even after maximum redistricting or cooperative organization has been accomplished, the distribution of students needing services in some remote sparsely populated areas is such that the usual means of transporting them daily to any type of specialized group instruction is infeasible.

With only a few handicapped students in a vast area, costs and logistics can become staggering. Bussing of students or use of cooperative arrangements among districts are out of the question. For one thing, distances are generally too vast. For another, even when villages are situated within a few miles of one another, inclement weather can make traveling even a short distance impossible. Loss of cultural identity/determination is also possible in areas in which a minority student would be transported from a native village to be educated with those of a majority culture.

SUMMARY

A number of conditions inherent in regional service delivery structures facilitate the problems listed in Table II. These include the limited special purposes of educational collaboratives, role and function ambiguities, geographic and professional isolation, separate governance and fiscal status, and the resulting complexity of interorganizational relationships.

As illustrated in Figure 2 below, NRP respondents in numerous studies reported that the benefits of collaboration (see Table I) decreased as local autonomy and input decreased. Interviewers also perceived that local commitment to regional special education programs was related to high degrees of local autonomy and input.

RELATIONSHIP OF LOCAL AUTONOMY, INPUT AND COMMITMENT TO PERCEIVED BENEFITS OF COLLABORATION

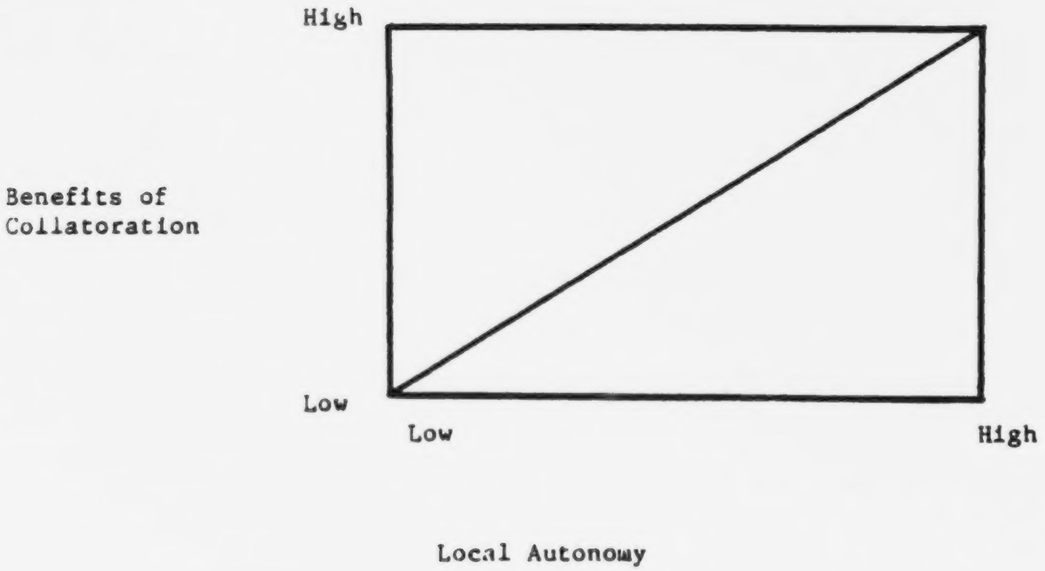

High
Benefits of Collatoration
Low
Low
High
Local Autonomy

Figure 2.

As regional structures became more formalized, operations tended to become more removed from the control of member districts and constituents. However, the degree of local autonomy could not be correlated with a specific type of collaborative. Rather, the cardinal principal appeared to be implementation of procedures designed to ensure local input and foster local commitment.

According to respondents, this basically meant use of centralized authority only when absolutely necessary. This premise is consistent with rural value systems which deplore unnecessary formality and bureaucracy, support local involvement, and take pride in local accomplishments. Activities such as public debates and advisory boards composed of representatives of member districts were reported to be particularly effective.

Figure 3 below illustrates that local involvement in collaborative decision making is also related to the degree of resistance to change when special educators attempt program innovations. Conservatism and the valuing of traditional approaches have been found to be inhibitors to comprehensive rural special education programming. Adept regional administrators will attempt to prevent resistance by meaningful involvement of local staff in regional decision making.

EFFECTS OF MEMBERSHIP IN A COLLABORATIVE ON A LOCAL DISTRICT'S RESISTANCE TO CHANGE

Increased Resistance	Decreased Resistance
Collaborative staff make all decisions and impose them on local districts.	Regional staff involve district leadership personnel as advisors and in decision making.

Figure 3.

Depending on the administrative style of the collaborative, a "benefit" of regional service delivery can become a "problem," or vice-versa. The example of parent involvement is noted in Figure 4 below.

EFFECTS OF REGIONAL SERVICE DELIVERY ON PARENT INVOLVEMENT

Factors Necessary to Enhance Parent Involvement

1. Students can be clustered for services or served by an itinerant, enabling students with severe and other low-incidence handicaps to be served locally vs. at a residential facility.
2. Administrative guidelines clarify who is responsible for parent education and home visits.
3. Collaborative staff make home visits. Regional specialists work directly with parents in implementing IEPs.
4. Itinerants become involved in, and more accepted by, students' communities.
5. Collaborative staff understand local power and communication structures.
6. Collaborative decision making boards and forums involve parents and other community members (particularly members of local power structure) as well as district-level staff.

Factors Which Decrease Parent Involvement

1. Long distances from regional services to students' homes.
2. Collaborative staff are "outsiders" without understanding of the local community and have no involvement other than occasional service delivery for short periods of time.
3. Collaborative does not involve local community power structure in decision making.
4. Local parents are not involved in regional advisory boards.
5. Educational value system or processes of collaborative vary significantly from those in the local district.
6. Responsibilities for home visits and other work with parents in community are non-existent or ill defined.
7. Local district is not integrally involved in decision making regarding regional services.
8. Local administrators voice dissatisfaction with the functioning of regional services or collaborative structure.

Figure 4.

BEST COPY AVAILABLE

Likewise, regional structures can have a positive, negative, or "no" effect on variables such as teacher retention. Figure 5 is illustrative.

EFFECTS OF COLLABORATIVE STRUCTURE ON TEACHER RETENTION VARIABLE

Increase Retention	No Effect On Retention	Decrease Retention
Itinerant or consulting specialists assist isolated generic teachers who lack other specialized resources.	District teachers are reared in local rural communities or are married to "permanent" community members.	Itinerant teachers experience extensive travel demands, scheduling problems, role ambiguities, inadequate "part time facilities," little input into decisions affecting their work, and lack of understanding of peers, parents or local community.

Figure 5.

BEST COPY AVAILABLE

BEST COPY AVAILABLE

SUCCESSFUL STRATEGIES

As analysts of futuristic trends forecast more networking and interagency collaboration (Naisbitt, 1983) and scholars of regional educational structures anticipate the formation of additional collaboratives (Howe, 1981), the field can expect the use or formation of collaboratives to increase. Whether a regional structure is regulatory or service oriented in nature and whether organized from the state or grass roots level, some strategies may tend to increase its effectiveness. Strategies that have been reported to facilitate the effectiveness of collaboratives are listed in Table III below.

Table III

STRATEGIES FOR SUCCESSFUL REGIONAL SERVICE DELIVERY

Legislative/Regulatory Agency Support

Appropriate Geographic Scope

Governing Structure Facilitating Achievement of Collaborative's Goals and Objectives

Allowance for Divergent Goals of Each Unit of the Collaborative

Clear Procedures for Service Delivery

Equitable Service Delivery Systems

Appropriate Lines of Staff Accountability

Effective Planning Based on Evaluation Data

Effective Communication Systems

Local District Responsibility for Special Education Services

Appropriate Involvement of the Public in Decision Making

Creation of Local Support for Change

Collaboration with Agencies External to Collaborative

Realistic and Effective Intra-Agency Collaboration

Facilitation of Parent Involvement

Emphasis on Retention of Qualified Personnel

Comprehensive Staff Development Programs

Creative Uses of Advanced Technologies

BEST COPY AVAILABLE

Each strategy is briefly described below.

1. Legislative/Regulatory Agency Support.

It is rare that a collaborative is technically (according to the formal organizational chart) independent from state or federal lines of accountability. Even in such instances, it behooves collaborative administrators to comply with relevant state and federal regulations and to develop supportive relationships with relevant state, regional, and federal administrators.

2. Appropriate Geographic Scope.

The region must be designed to serve a specific school population. The area of operation must be large enough to permit the efficient development of most services that local school systems cannot provide for themselves.

3. Governing Structure Facilitating Achievement of Collaborative's Goals and Objectives.

Administrators of successful collaboratives state that the governing structure is the factor that is most likely to facilitate success. Structural relationships should be addressed at the time that a collaborative is initiated. This reduces later internal operational conflicts, and agency energies can be directed toward the population to be served. Regulatory and monitoring roles should be separated from service roles.

Initial board composition and procedures for turnover must be determined. Procedures should guarantee that rural districts will be equitably represented. Thus, in many instances the "one person one vote" principle of governance will not be appropriate.

The fiscal agent must be agreed upon as well as procedures for budget accountability. If districts are to rotate responsibility for serving as a fiscal agent, appropriate procedures for determining rotation must be determined. Procedures for the selection of any policy or advisory fiscal subcommittees must be determined and agreed upon.

The collaborative must have adequate and dependable financial support, with some degree of flexibility in the use of funds. The fiscal agent should have the budgetary authority required and should serve as the chief administrative officer of the region when regional personnel are hired, grant applications submitted, etc.

Costs of administering regional programs must be computed and procedures for determining membership, tuition, and ser-

BEST COPY AVAILABLE

BEST COPY AVAILABLE

vice costs agreed upon. Safeguards should be designed so that districts that contract for services for an upcoming fiscal year do so in time for the collaborative to hire the most qualified personnel available and to project its transportation and other costs.

A leader for the collaborative should be identified who is widely respected by member district respresentatives and those having political power. This individual should have the capability to effectively serve as spokesperson for the region.

Role clarification is essential to inhibit future role conflicts. Specific roles must be determined and formally agreed upon for the collaborative, member districts, collaborative staff, and district personnel regarding policy setting, decision-making, regulation and monitoring, technical assistance, service coordination, service delivery, staff hiring, staff evaluation, parent education/involvement, home visitation, public relations, and public education.

The goals and objectives of the collaboratives should offer a clear direction for the services to be provided and the approaches necessary to maintain the region's integrity. Policies must be consistent with goals and objectives, and management practices must be consistent with the legal operation of schools within the state. Procedures should be established for the clarification of policy, as needed.

4. Allowance for Divergent Goals of Each Unit of the Collaborative.

Although a collaborative must have some general goals and common purposes, it is essential that individual units have some autonomy and the opportunity to self select specific goals to which they are committed. Regional administrators should recognize that it is not required that members collaborate on all issues and that members will have individual interests and priorities. The collaborative should define areas in which members can cooperate and concentrate first on mutual interest projects. Some members of regional structures reported that that functioned best by organizing loose cooperatives within the global districts/agencies delivering distinctly different services. Thus, service domains were not threatened yet a greater number of needs were met.

5. Clear Procedures for Service Delivery.

Clearly established policies are important. Otherwise, turnover at the leadership level will result in nullification of many essential agreements that, common to the rural style, were strictly informal. Formal policies and procedures should be as consistent as possible with the informal organizational chart. It is also important that formal styles of operation, when possible, remain consistent with rural values and norms (e.g., by not formalizing procedures when it is not necessary to do so).

6. Equitable Service Delivery Systems.

The collaborative referral system should be prioritized so that each contributing member, no matter what its size, receives its fair share of services. This typically does not occur when the "first come first served" philosophy (which also generally encourages overreferrals) is employed. The types of services to be offered should be based on documented needs. Services should, whenever possible, be located close to those receiving them.

7. Appropriate Lines of Staff Accountability.

Adequate consideration must be given to establishing effective relationships between the collaborative and each district in regular as well as special education matters. This includes the lines of accountability of all personnel hired by the collaborative to work with some or all of the districts involved. For example, it is wise to discuss guidelines for dividing service time for regional personnel among various duties and districts at an early stage. Some collaboratives find it effective to allocate district costs for regional staff on the basis of the amount of time involved in service delivery in a particular district. Other districts prefer that staff be paid on an equally split basis, no matter where services are delivered.

Another consideration involves clearly defining and incorporating the roles of special education teachers, directors, and parents currently operating in the geographic area to be served by the administrative functions of the region. The roles of regional superintendents should be defined in a way that allows their recommendations to become a functional part of the total operation. Staff role definitions should emphasize cooperation to accomplish service delivery.

Most school systems evaluate personnel and programs based on the amount of time spent in serving students and on student impact. Within a collaborative program, the press for accountability in these areas is even greater, since (a) cooperative units may each define differently what objectives are to be reached and the impact that the regional unit's staff should have, and (b) cooperating units wish to ascertain that their students are receiving their fair share of the regional unit's resources and programs. Thus, the staff in a cooperative program is accountable to more levels than staff in an individual school district and must report more than merely how time is spent and what educational impact is produced.

One large regional cooperative developed a computerized system to monitor the special education programs for low incidence handicapped children. The system contained a data base regarding the children served, the staff providing the services, and each specific service provided. The system cumulated the record of services provided and had a breakdown according to whom they were provided. This type of system allowed a diverse staff to geographically record how their time was expended with system components that could be individualized according to specific activity within the total system. Finally, it provided a method of reporting to each cooperative unit the quantity and types of services being provided. This also afforded economic savings in the preparation of necessary evaluations and reports.

No matter what accountability system is selected, attention should be given to ways of fairly observing staff and to determining exactly who is responsible for staff supervision. Methods of positive reinforcement and potential personnel retention methods should also be emphasized.

8. Effective Planning Based on Evaluation Data.

Information gathered from ongoing (formative) evaluation must be consistently used as input for planning. Member districts must recognize that some planning will thus be temporary so that appropriate adjustments can be made.

Accurate projections of disabilities in the region and associated future service and personnel needs, though difficult to obtain, are particularly useful for planning. This is especially important when regional boundaries are scheduled to shift (e.g., to include lower socioeconomic groups with attendant differences in handicapping conditions), when community population is expected to shift because of in- or outmigration, or when the roles of nearby residential schools are scheduled to shift because of trends of deinstitutionalizing individuals with severe disabilities.

Needs should continuously be assessed so that services can be developed and updated as needed. Needs assessments that simultaneously query respondents regarding potential program resources are particularly helpful.

9. Effective Communication Systems.

Districts and other members of collaboratives must have opportunities to share experiences and insights and to reflect upon their utility without endorsing "best" or "validated" solutions. Members must also be able to openly communicate regarding failures so that others can attempt to avoid repetitions of such.

10. Local District Responsibility for Special Education Services.

Collaborative special education services must be responsive to the needs and desires of local school systems, as seen from the local level. Larger districts within the collaborative cannot be allowed to dictate policy or program. Equally important, local districts must "own" the special education service delivery system. Shared decisionmaking, including participation in selection and supervision of regional personnel, will assist in increasing local commitment.

Services of the regional structure should be viewed as a supplement to the basic educational functions of local schools rather than usurping them. Authority as well as responsibility should be decentralized. This will involve local units sharing regional control responsibilities so that all needs are met.

Local ownership and commitment to special education services is enhanced by decentralization of services, particularly when this involves a real delegation of authority as well as responsibility. In fact, one of the most successful strategies involves the collaborative staff demanding that building principals be responsible for special education decisions made. (Some collaboratives will not allow district participation if school principals will not be responsible for decisions concerning special education services.) This practice facilitates mainstreaming because local administrators thus bear equal responsibility for handicapped and non-handicapped students. It also inhibits the common problem of districts viewing a collaborative program as a "dumping ground" for "problem students." Because local administrators are integrally involved in program development and implementation, regional staff are better understood when they call upon member districts to adapt programs and directions as circumstances and needs change. Regional services are also more stable, in spite of changes and realignments among participating local school districts.

11. Appropriate Involvement of the Public in Decision Making.

Any rural agenda, program, or policies should be derived with the benefit of input from the rural constituency. Processes such as involving representatives of the community, parent, private school, mental health agency, and other relevant regional groups on advisory and program planning committees will ensure that local community needs and cultural values are recognized as programs are planned. This will inhibit resistance to change, generate community and professional support and therefore facilitate program success.

NRP interviews of students with disabilities and their families indicated that such a process is felt to enhance program accountability to students with disabilities.

Informal communication systems in rural America are extremely effective. Astute regional program administrators involve key communicators in school district activities and provide them with accurate information for their dissemination.

12. Creation of Local Support for Change.

Local community support for expanded or changed special education services is essential. Collaborative administrators must create local support for change across the region so that local school agendas do not conflict with those of the collaborative.

Rural school leaders are usually products of their communities and are very sensitive to local values and expectations. Local citizens typically expect their schools to be informal, accessible, and to conserve existing local values. In fact, studies have consistently found that rural communities are resistant to change and that district administrators, lacking local political support, will be reluctant to become involved in activities to bring about or accommodate change (Nachtigal, 1982, Helge, 1981).

Member districts, affiliated agencies, and parents and other community members in the region should be involved in planning special education improvements and changes and must be continuously educated concerning how their constituencies will be better served.

Regional staff should strive to become part of the communities they serve, even if they are only occasional visitors. They should attempt to learn about local power and communication systems and to effectively use such knowledge. Expressing interest in community needs other than special education and offering to assist with regular as well as special education activities are examples of ways that "outsiders" can begin to be better accepted by being perceived as persons interested in the total community. Regional staff who have adopted these strategies sometimes find that their "temporary quarters" are made more appropriate for therapy or instruction, that parents tend to show up more frequently for conferences, and that their advice is more readily accepted.

13. Collaboration with Agencies External to Collaborative.

Inter-agency as well as intra-agency collaboration is advisable. Rural districts are usually isolated but operate best when using resources of all other possible rural agencies. It is advisable to link rural development and rural education efforts when possible. This is particularly true because agencies other than schools are required to address the complex problems of education which are embedded in the broad issues of poverty, high unemployment and underemployment, economic decline, legislative discrimination, and high in- or out-migration.

14. Realistic and Effective Intra-Agency Collaboration.

Realistic perspectives should be set regarding inter-agency collaboration and district motivations to become involved in a collaborative. The realities of unequal resources, emerging conflicts and struggles toward dominance, the effects of external changes and policies upon the collaborative, mandated decisions, screening of information shared, struggles toward domainance and control, and loyalties to local school boards or higher administrative units must be recognized. Basic structural conflicts are best dealt with at the time that the collaborative is organized, and other conflicts should be confronted as they emerge. Astute administrators will guard against the potential that units with inadequate resources and expertise be forced into defensive postures, in cases when collaboration is mandated.

If rural populations, especially school districts, are polarized, mutual projects may be doomed to failure because acceptance by one group ensures rejection by the other. The collaborative's goal should be to foster a sense of non-competitive cooperation, so that organizations can share resources, successes, and information about failures. Serious attempts should be made to identify spheres of expertise, avoiding intra-organizational jealousies.

It should not be assumed that the collaborative's activities will be all-encompassing. Rather open debates should occur reading each proposed activity. Collaborative members should question whether a service does not need to be formalized or can best be handled at the local level.

15. Facilitation of Parent Involvement.

Services should be delivered as close to the student's home as possible and parents should have meaningful input regarding service methods and location. Staff vs. student travel should be considered. This may include innovative proven techniques such as involving local private pilots who will voluntarily transport staff at no charge. Technical alternatives such as instruction by satellite or remote computer should also be considered.

Local parent involvement is also important when students are not served in the immediate area. Local parent education and support groups can be supplemented by home visits.

16. Emphasis on Retention of Qualified Personnel.

As itinerant staff experience unique professional frustrations and are difficult to retain, astute administrators carefully improve their environments. Physical facilities should be as appropriate and pleasant as possible and needed equipment should be available. At least as important (according to staff retention statistics), local building personnel should accept the itinerant as an ongoing part of their program and understand their unique roles. Local administrators can assist in establishing a local peer support system and making successful contacts with local parents. Temporary role exchanges have been found useful as have interdisciplinary teaming and involving itinerants in local meetings and activities.

Itinerants should become aware of local power and communication structures, express interest in general as well as special education activities, if possible, and attend community functions.

The investment of such time is important for gaining the support of local staff and parents.

Alternatives to the professional "down time" of travel should be pursued (e.g., listening to educational cassettes, recording reports, varying travel schedules, using technological alternatives for remote service delivery/feedback, or planning interdisciplinary team evaluations).

Competent staff should be made to feel professionally secure through clear reward structures, administrative and peer support, and the awareness of career ladders within or external to the collaborative.

17. Comprehensive Staff Development Programs.

Kirmer, et.al. (1984) outlined a successful process of staff development within collaboratives which included inservice for regular educators and administrators as well as for special educators. In concert with interdisciplinary teaming, this strategy emphasized that all professionals are required for effective service delivery. Kirmer, et.al. (1984) also stressed the importance of trainees working in building teams with the relevant program coordinator clarifying the missions of itinerant staff.

Staff development must be an ongoing systematic process of confronting problems. Experiences should be as individualized as necessary since the collaborative will consistently have new staff and personnel with widely diverse responsibilities. All potential resources should be used ranging from university or community college courses to peer instruction. Because of the remote locations of many school personnel, the use of advanced technologies such as two-way use of educational satellities, exchanges of videodiscs for instruction/feedback, or simpler audiocommunications will be necessary.

BEST COPY AVAIL

18. Creative Uses of Advanced Technologies.

Advanced technologies are particularly helpful where the sharing of personnel and programs is impeded by vast distances to cover, few children with similar needs, unique cultures to be served, and climatic problems.

Appropriate technological alternatives include remote electronic instruction (e.g., from a district to another district, collaborative headquarters, or university practicum), mobile computer labs used for particular services or course subjects, two-way television courses, telephone hookups, and video/cassette tape feedback. Collaboratives can use advanced technologies for instructional support, parent involvement, management, staff development, or instruction. Potential uses are limited primarily by the imaginations of planners.

BEST COPY AVAILABLE

CONCLUSIONS

This document has discussed the types, benefits, and problems of educational collaboratives. Research-based strategies for enhancing regional service delivery have been described.

Coalitions of professional organizations are a trend of the future, and the trend is toward more educational collaboratives in all but a few states. Rural educational collaboratives should be developed or improved in ways consistent with forecasts of futuristic societal trends. These will include true delegation of authority as well as responsibility, and an emphasis on networking groups of agencies and individuals for problem solving. Innovative uses of advanced technologies will be particularly advantageous in areas in which geography and climate pose barriers to service delivery or collaboration.

As illustrated in this report, educational collaboratives can have positive or negative impacts on service delivery. Thus it is essential that regional services are designed to be consistent with local value systems of the rural communities in which they will be delivered. Local involvement in planning, implementation, and feedback are imperative; and it is important that regional structures are as informally accessible as they are impartially available.

BIBLIOGRAPHY

A survey of special education costs in local school districts. Washington, D.C.: National School Boards Association, 1979, 27 pp.

Baker, L. E. Perspectives on interorganizational relationships. Unpublished paper written for National Institute of Education, Washington, D.C., 1980, 18 pp.

Barker, B. A descriptive study of K-12 and 1-12 rural school systems in the United States. Unpublished doctoral dissertation. Brigham Young University. Provo, Utah, 1983.

BEH lacks rural special education strategy, expert says. Education of the Handicapped, January 6, 1979, p. 5.

Costs are double to educate the handicapped, school boards confirm. Education of the Handicapped, June 20, 1979, p. 3.

Education of the Handicapped, Education Turnkey System Study, January 17, 1979, p. 5.

Fritz, A. Differences among special education teachers with long term careers in different size school districts. (Doctoral dissertation, Kansas State University, 1982.) Dissertation Abstracts International.

Helge, D. I. (A) National comparative study regarding rural special education delivery systems before and after passage of PL 94-142. Murray, KY: Center for Innovation and Development, Murray State University, 1980, 158 pp.

Helge, D. I. National research identifying problems in implementing comprehensive special education programming in rural areas. Exceptional Children, April 1981, 47(7), pp. 514-520.

Helge, D. I. Images: Issues and trends in rural special education - January, 1983. National Rural Project, Center for Innovation and Development, Murray, KY, 1983.

Helge, . I. The state of the art of rural specal education. Exceptional Children, January 1984, 50(4), pp. 294-305.

Howe, C. E. Administration of special education. Denver, Colorado: Love Publishing Company, 1981.

Isenberg, R. M. Various approaches to developing area programs. In C. H. Meisgeier and J. D. King (eds.) The process of special education administration. Scranton, PA: Intext, 1970, pp. 129-141.

Jacobsmeyer, D. J. Rural education initiative. A report on the regional rural round tables. Kansas City, MO: Office of Educational Programs, Region VII, 1979, 60 pp.

Kirmer, K., Lockwood, L., Mickler, W., and Sweeney, P. Regional rural special education programs. Exceptional Children, January 1984, 50(4), pp 306-311.

Kohl, J. W. & Marro, T. D. A normative study of the administrative position in special education (USOE). Project No. 482266, Grant No. (OEC 0-70-2467607). University Park, PA: Center for Cooperative Research With Schools, Pennsylvania State University, 1971.

Mack, D. P., and Stephens, E. R. Structural approaches to meeting educational needs. Paper presented at National Seminar on Rural Education, University of Maryland, College Park, MD, May 1979.

Nachtigal, P. M. (Ed.) Rural education: In search of a better way. Boulder, CO: Westview Press, 1982.

Naisbitt, J. Megatrends: Ten new directions transforming our lives. New York: Warner Books, 1983.

National Seminar on Rural Education. College Park, MD: University of Maryland, Center for Adult Education, May 1979, 24 pp.

Offices of Rural and Human Development. Getting human services to rural people: Part I - Final Report. Washington, D.C.: Department of Health, Education, and Welfare, June, 1976.

Rosenfeld, S. A. In A portrait of rural America: Conditions affecting vocational education policy. Vocational education study publication No. 6. Washington, D.C.: National Institute of Education, 1981.

Sher, J. P. A proposal to end federal neglect of rural schools. Phi Delta Kappan, 1978, 60(4), pp. 280-82.

Sher, J. P. Education in Rural America. Boulder, Colorado: Westview Press, 1977.

Shulman, M. S. and Doughty, J. F. Regionalizing special education Programs in Maine. In John T. Kierstead (ed.), Augusta, Maine: Maine Department of Education and Cultural Services: Division of Special Education, Summer, 1983.

Weber, D. B. and Rockoff, E. S. The relationship between demographic characteristics of local education agencies and compliance with PL 93-380 and PL 94-142. Journal of Special Education, 14(2), Summer 1980, p. 243-251.

BEST COPY AVAILABLE